

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LESLIE JACK, Individually and as Personal
Representative of the Estate of PATRICK
JACK; DAVID JACK, individually,

Plaintiffs,

v.

ASBESTOS CORPORATION LTD., et al.,

Defendants.

No. 2:17-cv-00537-JLR

JOINT PRETRIAL ORDER

I. JURISDICTION

The Court has diversity jurisdiction over the above-captioned matter because the amount in controversy exceeds \$75,000 and Plaintiffs and Defendants are residents of different states. 28 U.S.C. sec. 1332.

II. CLAIMS FOR RELIEF

1. Plaintiffs claim Defendant Borg Warner is liable for negligence, including negligent manufacture, negligent design, and negligence in connection with its duty to inspect, test, monitor, recall, instruct, and/or warn, including pre- and post-sale/manufacture.

1 2. Plaintiffs claim Defendant Borg Warner is liable under a theory of strict product
2 liability, including for marketing products not reasonably safe as manufactured, marketed, or
3 distributed; marketing products not reasonably safe for lack of adequate warnings or
4 instructions.

5 3. Plaintiffs claim Defendant DCo, LLC is liable for negligence, including negligent
6 manufacture, negligent design, and negligence in connection with its duty to inspect, test,
7 monitor, recall, instruct, and/or warn, including pre- and post-sale/manufacture.

8 4. Plaintiffs claim Defendant DCo, LLC is liable under a theory of strict product
9 liability, including for marketing products not reasonably safe as manufactured, marketed, or
10 distributed; marketing products not reasonably safe for lack of adequate warnings or
11 instructions.

12 5. Plaintiffs claim Defendant Ford Motor Company is liable for negligence, including
13 negligent manufacture, negligent design, and negligence in connection with its duty to
14 inspect, test, monitor, recall, instruct, and/or warn, including pre- and post-sale/manufacture.

15 6. Plaintiffs claim Defendant Ford Motor Company is liable under a theory of strict
16 product liability, including for marketing products not reasonably safe as manufactured,
17 marketed, or distributed; marketing products not reasonably safe for lack of adequate
18 warnings or instructions.

19 7. Plaintiffs claim Defendant Union Pacific Railroad is liable for negligence associated
20 with its unsafe work with asbestos and asbestos-containing products on its premises, as well
21 as associated with its work with asbestos and asbestos-containing products in its rail yards
22 and other areas, as well as its failure to warn its own employees or take precautions to protect
23 them, their families, and bystanders.
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1 8. Plaintiffs claim Defendant Viad Corp is liable for negligence, including negligent
2 manufacture, negligent design, and negligence in connection with its duty to inspect, test,
3 monitor, recall, instruct, and/or warn, including pre- and post-sale/manufacture.

4 9. Plaintiffs claim Defendant Viad Corp is liable under a theory of strict product
5 liability, including for marketing products not reasonably safe as manufactured, marketed, or
6 distributed; marketing products not reasonably safe for lack of adequate warnings or
7 instructions.
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9 **III. UNDISPUTED FACTS**

- 10 1. Patrick Jack was diagnosed with pleural mesothelioma in July of 2016.
11 2. Mr. Jack died of mesothelioma on October 15, 2017.
12

13 **IV. ISSUES OF LAW**

14 The parties await the Court's decisions on Plaintiffs' and Defendants' motions for
15 summary judgment. Issues encompassed therein include whether certain affirmative defenses
16 fail under the facts of this case, the extent of exposure to Defendants' asbestos-containing
17 products, and whether Viad Corp may be granted summary judgment in light of Plaintiffs'
18 Rule 56(d) request for a continuance to take a deposition of Viad's corporate representative
19 regarding the issue of whether it is the successor-in-interest to Griscom Russell for
20 evaporators.
21

22 **A. BORGWARNER MORSE TEC, LLC**

23 In addition to the issues of law proposed by Plaintiffs, BWMT believes that the
24 following issues of law will need to be addressed by the Court:
25

- 26 1. Whether Plaintiff Leslie Jack is entitled to a claim for loss of consortium
under the Wrongful Death Statute.

1 2. Whether there is sufficient evidence that Decedent Patrick Jack was
2 exposed to more than de minimis amount, if any, of respirable asbestos from BWMT
3 clutch dust.

4 3. If Decedent Patrick Jack was exposed to more than de minimis respirable
5 asbestos from BWMT clutch dust, whether there is sufficient evidence that the exposure
6 was a substantial factor in causing his disease.

7 4. Whether there is sufficient admissible scientific evidence that exposure to
8 clutch dust increases the risk of mesothelioma.

9 5. Whether the expert opinion testimony proffered by Plaintiffs is predicated
10 on the unscientific “every exposure” theory.

11 6. If Decedent Patrick Jack was exposed to asbestos from BWMT clutch dust
12 and the exposure was a substantial factor in causing his disease, what damages, if any, are
13 Plaintiffs entitled to recover.

14 7. Whether Plaintiffs’ damages, if any, should be reduced or eliminated due to
15 the comparative fault of decedent Patrick Jack in failing to take reasonable precautions for
16 his own health by using protective respiratory equipment while he performed work in the
17 United States Navy, United States Naval Reserves, while working as a Machinist and
18 Nuclear Inspector at Puget Sound Naval Shipyards, and/or while performing automotive
19 repair work?

20 8. Whether BWMT should be permitted to present evidence and argue to the jury
21 that Plaintiffs’ damages, if any, should be reduced or eliminated due to the failure of
22 decedent Patrick Jack’s employers to take adequate precautions for his health and provide
23 decedent with a safe workplace?

24 9. Whether BWMT should be permitted to present evidence and argue to the jury
25 that Plaintiffs’ damages, if any, were caused by or contributed to by the intervening,
26

1 superseding, and unexpected conduct, acts, or failure to act by persons or entities outside of
2 BMWT's control or right of control?

3 BMWT reserves the right to revise or amend these issues to the extent the Court's
4 ruling on BWMT's pending Motion for Summary Judgment impacts, modifies, or otherwise
5 identifies these or other relevant issues of law.

6 **B. DCO, LLC**

7 DCo, LLC believes the following are the issues of law to be determined by the court:

8 1. Whether Plaintiffs' damages, if any, should be reduced or eliminated due to
9 the comparative fault of decedent Patrick Jack in failing to take reasonable precautions for
10 his own health by using protective respiratory equipment while he performed work in the
11 United States Navy, United States Naval Reserves, while working as a Machinist and
12 Nuclear Inspector at Puget Sound Naval Shipyards, and/or while performing automotive
13 repair work?

14 2. Whether DCo should be permitted to present evidence and argue to the jury
15 that Plaintiffs' damages, if any, should be reduced or eliminated due to the failure of
16 decedent Patrick Jack's employers to take adequate precautions for his health and provide
17 decedent with a safe workplace?

18 3. Whether DCo should be permitted to present evidence and argue to the jury
19 that Plaintiffs' damages, if any, were caused by or contributed to by the intervening,
20 superseding, and unexpected conduct, acts, or failure to act by persons or entities outside of
21 DCo's control or right of control?

22 4. Whether DCo should be permitted to present evidence and argue to the jury
23 that Plaintiffs' damages, if any, should be reduced or eliminated due to the fact that decedent
24 Patrick Jack's employers (U.S. Navy and Puget Sound Naval Shipyards) were sophisticated
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1 users of asbestos-containing products and should have known of the dangers or hazards
2 associated with the use of such products and whether Patrick Jack's employers failed to take
3 adequate precautions for his health and provide decedent with a safe workplace?

4 5. Whether any claimed exposure of decedent Patrick Jack from DCo's allegedly
5 asbestos-containing products was so minimal ("de minimis") as to be insufficient to establish
6 a reasonably degree of probability that DCo's products could have caused or contributed to
7 Plaintiffs' claimed injuries?
8

9 6. Whether the Washington Product Liability Act Applies to Plaintiffs' Claims
10 Against DCo.

11 **C. VIAD CORP**

12 1. Is there any evidence supporting the application of the Woo exception to the
13 Simonetta rule on duty to warn?
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15 2. Is the Navy's knowledge of the hazards of asbestos relevant to the proximate
16 cause issue of whether the absence of a warning about asbestos on the evaporator
17 proximately caused Mr. Jack's mesothelioma?

18 3. Is there sufficient evidence to support a finding that Mr. Jack's alleged
19 exposure to asbestos installed on or in Griscom-Russell's evaporator was a proximate cause
20 of Mr. Jack's mesothelioma?
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22 4. Is there sufficient evidence to support a finding that Mr. Jack's alleged
23 exposure to asbestos installed on or in Griscom-Russell's evaporator was proximately caused
24 by Griscom-Russell's alleged failure to warn?

25 5. Does the pass through of BLH-PA's liabilities to BLH-DE require a finding
26 that Viad did not succeed to Griscom-Russell's liabilities?

1 6. Did Viad succeed to the liabilities of Griscom-Russell?

2 7. Whether Leslie Jack is a proper Plaintiff as she married Patrick Jack after he
3 had already been diagnosed with mesothelioma?

4 **D. FORD MOTOR COMPANY**

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6 Ford states as follows: Plaintiffs' Pretrial Statement listed no specific issues of law.
7 In their response to Defendants' Motions for Partial Summary Judgment (Dkt. # 604 at 12),
8 Plaintiffs, however, withdrew a) Their premises claims against Ford; b) Any claim for
9 punitive damages against any defendant; and c) Their "catch-all" claims against Ford.
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11 Ford reserves for itself further response in this regard pending the Court's rulings on
12 motions for partial summary judgment and motions in limine.
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14 **E. UNION PACIFIC**

15 1. Whether Plaintiff Leslie Jack is entitled to a claim for loss of consortium
16 under the Washington Wrongful Death Act.
17

18 2. Whether the Decedent's alleged exposure to Union Pacific attributable
19 asbestos was a substantial contributing factor in causing or contributing to his disease.
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21 3. Whether Union Pacific may be held liable for Plaintiffs' "take-home" exposure
22 claim as a matter of law.
23

24 4. Whether Plaintiffs have sufficient evidence to support their claims for
25 damages.
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 Union Pacific reserves the right to revise or amend these issues to the extent the

1 Court's ruling on Union Pacific's pending Motion for Summary Judgment impacts, modifies,
2 or otherwise identifies these or other relevant issues of law.

3 **V. EXPERT WITNESSES**

4 **(1) On behalf of Plaintiffs**

5 **A. Carl Andrew Brodtkin, MD, MPH (will testify)**

6 Dr. Brodtkin is a specialist in pulmonary and occupational medicine. Dr. Brodtkin may
7 testify as to the historic state of the medical and scientific art concerning asbestos-related
8 diseases at relevant times, and may testify as to his opinions and conclusions regarding
9 Patrick Jack's medical condition, decline, and death. Dr. Brodtkin may also testify regarding
10 the following issues: Mr. Jack's medical conditions, the causes of those conditions, including
11 the causes of asbestos-related diseases and the cause of Mr. Jack's asbestos-related disease,
12 the types and amounts of asbestos fibers necessary to cause disease, the risks associated with
13 exposure to asbestos for developing asbestos-related diseases, the epidemiologic evidence
14 relating to the causes of asbestos-related diseases, including mesothelioma, and the
15 pathogenesis of cancer and other asbestos-related diseases. Dr. Brodtkin may testify about the
16 review and meaning of relevant medical records, pathology materials, and other diagnostic
17 and medical data available. He may also testify regarding human anatomy and associated
18 asbestos-induced pathology of human lungs and asbestos' effects on human immune systems.
19 Dr. Brodtkin will also testify about Patrick Jack's exposure to various asbestos-containing
20 products, including asbestos-containing thermal insulation, cement pipe, gaskets, brakes,
21 clutches, and evaporators. He will testify about the published literature and its availability,
22 dissemination, and circulation to public, private, medical, scientific, academic, and industrial
23 concerns. Dr. Brodtkin may testify about the substance, quality, reliability and availability of
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1 the medical and scientific evidence relating to asbestos diseases, exposure, and the hazards of
2 asbestos. He may testify about the trade organizations, their activities and knowledge and
3 dissemination of information regarding the hazards of asbestos. He may testify about the
4 visibility of dust containing asbestos and what was historically known and understood
5 regarding what constituted a hazard in the workplace. Dr. Brodtkin will also testify regarding
6 the epidemiological evidence as it relates to asbestos-related illness and diseases. He will also
7 testify regarding the morbidity and mortality associated with asbestos-related disease, as well
8 as the fact that Mr. Jack's medical procedures and medical bills were both reasonable and
9 necessary. The basis of Dr. Brodtkin's opinions is his research, training, expertise, and the
10 evidence reviewed by him in this case.
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12 **B. Barry I. Castleman, Sc.D. (may testify)**

13 Dr. Castleman is an engineer and historian with expertise regarding the history of
14 corporate knowledge regarding the hazards of asbestos, the so-called "state of the art." He
15 may testify regarding the historical development of scientific knowledge concerning the
16 hazards of asbestos. He may testify about the published literature and how it was available,
17 disseminated, and circulated to medical, private, scientific, academic and industrial concerns.
18 He may testify about the historical knowledge of defendants in this action regarding the
19 hazards associated with asbestos as reflected in corporate documents and historical records.
20 He may also testify about the historical development of the OSHA asbestos standard, the
21 proposed OSHA construction standard, NIOSH, and the contents of the NIOSH asbestos
22 criteria documents. Dr. Castleman may testify about the substance, quality, reliability and
23 availability of the medical and scientific evidence relating to asbestos diseases and hazards.
24 This expert may testify about existing trade organizations, their activities and knowledge, and
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1 dissemination of hazards relating to asbestos. Dr. Castleman may testify about what was
2 historically known and knowable regarding what constituted a hazard in the workplace,
3 including but not limited to Threshold Limit Values and their relationship, if any, to cancer.
4 The basis for Dr. Castleman's opinions is his research, training, and experience, as well as
5 the medical and employment activities of the plaintiffs.
6

7 **C. Sean Fitzgerald (will testify)**

8 Mr. Fitzgerald will testify about the asbestos-content and type of asbestos fibers
9 found in the Victor gaskets found in Mr. Jack's garage.

10 **D. Ronald Gordon, PhD (will testify)**

11 Dr. Gordon will testify about the asbestos fibers found in Mr. Jack's body, the time
12 period when they got there, and the significance of those findings.

13 **E. Captain William Lowell (may testify)**

14 Captain Lowell may testify regarding the asbestos-containing components and
15 insulation associated with the Griscom Russell evaporators aboard the USS Brannon, as well
16 as various issues regarding naval and shipyard policies and procedures.
17

18 **F. Arnold Brody, PhD (will testify)**

19 Dr. Brody will testify about how asbestos moves through the body and reaches the
20 target cells to cause pleural mesothelioma, including how asbestos travels through the body's
21 lymphatic system to reach the pleura. He will present photographs and images of asbestos
22 interacting with cells, dna, and macrophages in the human body and the body's defense
23 mechanisms. He will testify concering the worldwide public health and scientific consensus
24 that all fiber types cause mesothelioma and that science has been unable to find a level of
25 exposure to asbestos below which mesothelioma does not occur. Dr. Brody will testify
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1 regarding the different fiber types, including the fact that Canadian chrysotile asbestos is
2 contaminated with tremolite asbestos.

3 **(2) On behalf of Defendants**

4 **BorgWarner Morse TEC, LLC**

5 1. Dominik D. Alexander, PhD, MSPH, EpidStat Institute, 2100 Commonwealth Blvd,
6 Suite 203, Ann Arbor, MI 48105. Dr. Alexander will testify at trial live and/or via his
7 deposition taken on June 8, 2018, regarding his review of the plaintiff specific materials, his
8 report dated April 17, 2018, his supplemental report(s) dated June 6, 2018, literature and per
9 his expertise as an epidemiologist.
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11 2. Clancy Cornwall, McCaffery & Associates, Inc., 107 S. West Street, Ste. 309,
12 Alexandria, VA 22314. Mr. Cornwall will testify at trial live and/or via his deposition taken
13 on June 13, 2018, regarding his review of the plaintiff specific materials, case notes,
14 literature and per his expertise as a Navy expert.
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16 3. Victor L. Roggli, M.D. Pathology Department Medical Duke University Medical
17 Center, 200 Trent Drive, Pathology Dept, 263M DUMC 3712, Durham, NC 27710. Dr.
18 Roggli may testify about his review of Mr. Jack's pathology specimens and his digestion of
19 Mr. Jack's lung tissue. If called to testify, he will state Mr. Jack had relatively low-level
20 occupational exposure to amosite asbestos that caused his mesothelioma. Exposure to
21 chrysotile asbestos in gasket materials did not cause or contribute to the development of Mr.
22 Jack's mesothelioma.
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24 4. David Weill, MD, Stanford University, 300 Pasteur Drive, Room H3134, Stanford,
25 CA 94305-5236. Dr. Weill will testify at live at trial and/or via his deposition taken on June
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1 18, 2018, regarding his review of the plaintiff specific materials, his report dated April 9,
2 2018, literature and per his expertise as a pulmonary disease and internal medicine.

3 5. Sheldon Rabinovitz, PhD, CIH, 839 Quince Orchard Boulevard, Suite E,
4 Gaithersburg, MD 20878-1614. Sheldon Rabinovitz, PhD, CIH is a Certified Industrial
5 Hygienist. Dr. Rabinovitz is expected to testify at trial live as an expert in the field of
6 industrial hygiene and his familiarity with the medical industrial hygiene and
7 epidemiological literature concerning occupational exposure to asbestos, including the
8 possible exposure of mechanics to asbestos-containing friction products.
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10 **DCo LLC**
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12 1. Dominik D. Alexander, PhD, MSPH, EpidStat Institute, 2100 Commonwealth
13 Blvd, Suite 203, Ann Arbor, MI 48105. Dr. Alexander will testify at trial live and/or via his
14 deposition taken on June 8, 2018, regarding his review of the plaintiff specific materials, his
15 report dated April 17, 2018, his supplemental report dated June 6, 2018, literature and per his
16 expertise as an epidemiologist.

17 2. Clancy Cornwall, McCaffery & Associates, Inc., 107 S. West Street, Ste. 309,
18 Alexandria, VA 22314. Mr. Cornwall will testify at trial live and/or via his deposition taken
19 on June 13, 2018, regarding his review of the plaintiff specific materials, his report filed
20 April 18, 2018, case notes, literature and per his expertise as a Navy expert.
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1 3. Mary A. Finn, Ph.D., MPH, CIH, Finn Consulting Services, Ltd., 5772
2 Gallery Court, West Des Moines, IA 50266. Dr. Finn will testify at trial live and/or via her
3 deposition taken on June 15, 2018, regarding her review of the plaintiff specific materials,
4 her report dated April 16, 2018, her supplemental report dated June 6, 2018, literature and
5 per her expertise in Industrial Hygiene.
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7 4. David Weill, MD, Stanford University, 300 Pasteur Drive, Room H3134,
8 Stanford, CA 94305-5236. Dr. Weill will testify at live at trial and/or via his deposition taken
9 on June 18, 2018, regarding his review of the plaintiff specific materials, his report dated
10 April 9, 2018, literature and per his expertise as a pulmonary disease and internal medicine.
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12 5. Andrew Churg, MD, University of British Columbia, Vancouver, BC Canada.
13 Dr. Churg will testify at trial live and/or via his deposition taken on June 14, 2018, regarding
14 his review of the plaintiff specific materials, his report dated April 14, 2018 and his
15 supplemental report dated June 25, 2018, and literature per his expertise in pathology.
16

Viad Corp

The following witnesses will testify

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18 A. **Charles R. Cushing, Ph.D., P.E.**
19 **C. R. Cushing & Co., Inc.**
20 **30 Vesey Street**
 New York, NY 10007

21 Dr. Cushing will testify that Griscom-Russell supplied the Navy with distilling plants
22 that were bare of insulation in accordance with precise detailed specifications, which
23 addressed warnings. The Navy insulated the distillers after they were installed on the ship
24 and tested. The Navy decided whether to use asbestos insulation and, at the time it insulated
25 the distiller on the USS Brannon, asbestos insulation likely was not used because asbestos
26 was a critical material during WWII and the temperature at which the distiller operated was

1 low enough that insulations other than asbestos could be used without impairing the function
2 of the distiller. By the time Mr. Jack first boarded the USS Brannon all of the original
3 gaskets in the distiller (only some of which were asbestos) had been replaced. Non-asbestos
4 gaskets could have been used as replacements. Griscom-Russell did not supply replacement
5 gaskets.
6

7 **B. David P. Sargent, Jr.**
8 **SEI Enterprises, Inc.**
9 **P.O. Box 1466**
10 **Great Falls, VA 22066-1466**

11 David P. Sargent, Jr. is a retired Rear Admiral of the United States Navy. He will
12 testify that Griscom-Russell supplied the Navy with the evaporator on Mr. Jack's ship in
13 conformity to detailed precise specifications. It supplied the evaporator without insulation.
14 The Navy did not consult it about the type of insulation it planned to use on the evaporator.
15 The Navy's specifications, policies, practices and procedures prohibited Griscom-Russell
16 from warning about the hazards of asbestos. If asked by Griscom-Russell to make an
17 exception to the specifications to allow an asbestos warning, the Navy would have declined.
18 Asbestos was a critical material during WWII when the Navy installed the distiller on Mr.
19 Jack's ship. The decision as to what insulation to use was solely that of the U.S. Navy.
20 Suitable non-asbestos materials could have been selected, specified and installed on an
21 evaporator. On the USS BRANNON this could have included fiberglass, mineral wool or
22 other non-asbestos insulation.

23 **The following witnesses may testify**

24 **C. Victor L. Roggli, M.D.**
25 **Pathology Department Medical**
26 **Duke University Medical Center**
200 Trent Drive, Pathology Dept, 263M
DUMC 3712

1 **Durham, NC 27710**

2
3 Dr. Roggli may testify about his review of Mr. Jack's pathology specimens and his
4 digestion of Mr. Jack's lung tissue. If called to testify, he will state Mr. Jack had relatively
5 low-level occupational exposure to amosite asbestos that caused his mesothelioma. Exposure
6 to chrysotile asbestos in gasket materials did not cause or contribute to the development of
7 Mr. Jack's mesothelioma.

8 **D. Viad Corporate Representative - Jon Massimino**
9 **Phoenix, AZ**

10 This witness from Viad may be called to testify only if necessary to authenticate trial
11 exhibits.

12 **Ford Motor Company**

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14 Ford will call the following expert witnesses:

- 15 a. Dr. Andrew Churg;
16 b. Dr. Suresh Moolgavkar; and
17 c. Dr. Pamela Williams.

18 Ford has provided reports for these witnesses and Plaintiffs have taken their
19 depositions. The witnesses' addresses and opinions are included in their reports. Dr. Churg
20 is a pathologist, Dr. Moolgavkar is an epidemiologist and Dr. Williams is an industrial
21 hygienist. Reflecting these respective areas of expertise, Ford's expert witnesses are
22 expected to testify that (a) Mr. Jack's mesothelioma was caused by his exposure to
23 amphibole asbestos while serving in the United States Navy and while working at PSNS; and
24 (b) any work with or around Ford products (brakes, clutches and/or gaskets) neither caused
25 nor contributed to Mr. Jack's mesothelioma. As reflected in his reports (original and
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supplemental) and his deposition, Dr. Churg will also testify regarding (a) the scientific validity of the fiber burden study performed by Dr. Victor Roggli for Co-Defendants; and (b) the scientific invalidity of the fiber burden study performed by Dr. Ronald Gordon for Plaintiffs.

Further, Ford may call its corporate representative, Matthew Fyie, who was deposed by Plaintiffs in this case under Federal Rule of Civil Procedure 30(b)(6), depending on Plaintiffs' presentation at trial.

Union Pacific Railroad Company

Name	Party Calling	Brief Description of Testimony	Will Testify or Possible Testimony
Carl Bradley (Expert testimony)	Union Pacific	Former General Superintendent for Union Pacific Railroad Company and Corporate Representative and/or Former Employee of Union Pacific Mr. Bradley will offer testimony concerning the operations of Union Pacific Railroad Company and Southern Pacific during the relevant time period. He will also offer testimony regarding historical operations and practices of Union Pacific and Southern Pacific employees including, but not limited to, with respect to locomotive and rolling stock maintenance and repair. His opinions may be viewed as "expert opinions" in addition to his fact opinions.	Will testify
C. Alan Brown M.D. (Expert Testimony)	Union Pacific	Cardiologist Dr. Brown may testify concerning Decedent's medical conditions that were not related to asbestos-related disease , prognosis, and causation	Will Testify
Clancy Cornwall (Expert Testimony)	Union Pacific	Senior Researcher/Analyst and Director of Operations Mr. Cornwall is a maritime technical consultant and researcher. His expertise qualifies him to locate and analyze U.S. Navy and Merchant ship design,	

1		development, construction, maintenance and repair records, plans and	
2		photographs. He also researches U.S.	
3		Navy personnel records and	
4		Navy/Military specifications, qualified	
5		product lists and related records. This	
6		research, combined with Mr. Cornwall's	
7		experience, training and education have	
8		provided him with a unique grasp of the	
9		naval and maritime practices and	
10		policies, including the use of asbestos-	
11		containing materials. In that regard, Mr.	
12		Cornwall has conducted research with	
13		respect to the use and presence of	
14		asbestos-containing materials on the	
15		vessels and in the shipyards of ships	
16		Decedent served on and/or worked.	
17	James Delaney	Union	Naval Expert
18	(Expert	Pacific	
19	Testimony)		Mr. Delaney was employed by the U.S.
20			Navy from 1964 through 1997. He
21			attended Machinist's Class A School,
22			BasicNuclear Power School and the
23			Nuclear Prototype in Bainbridge,
24			Maryland. He was retained as a staff
25			instructor at theNuclear Prototype. He
26			served as a machinist's mate aboard the
			USS Randolph, USS Enterprise, USS
			South Carolina, USS Puget Sound and
			USS Mississippi. In 1979 he was
			assigned to the staff of Deputy Director,
			Naval Nuclear Propulsion Program
			(ADM Rickover). He personally
			authored the quality assurance manuals
			for nuclear prototypes. In 1991 he
			reported to Submarine Base, Pearl
			Harbor and served as Quality Assurance
			Office/Radiation Safety Officer and
			Nuclear Repair Officer. In 1995 he
			reported to Naval Sea Systems
			Command, Washington, D.C. as a major
			Program Manager. Based upon his
			extensive experience with the U.S.
			Navy, Mr. Delaney's testimony will
			include, but not be limited to, the
			following subjects: the operation and
			repair of basic steam plant equipment,
			pipng, pumps and valves; the
			overseeing of regular and refueling
			overhauls of the engine room and
			reactor compartment, including most
			steam valves; the specification of repair
			procedures and test requirements on

1		U.S. Navy vessels; the U.S. Navy's radiological procedures and controls; and the overseeing of refitting and modification of engineering and propulsion plants, tests and trials for these vessels. Based on his education, training, and experience, Mr. Delaney will testify about the maintenance and repair of equipment on vessels and discuss applications and use of asbestos-containing products in said spaces.	
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7	Larry Liukonen, CIH	Industrial Hygienist	Will Testify
8	(Expert Testimony)	Mr. Liukonen will testify concerning issues relating to asbestos industrial hygiene, safety and abatement, including practices of Union Pacific's relevant predecessor. He will also opine regarding issues of custom and practice and compliance with industry and state of the art practices during the relevant time period at issue.	
9		Mr. Liukonen will also testify and offer opinions regarding the application of certain federal regulations, statutes, acts and regulatory schemes including, but not limited to, the Boiler Inspection Act, the Federal Locomotive Inspection Act, the Federal Railroad Administration Safety and Maintenance Rules and Safety Appliance Act, to allegations against Union Pacific in this case. Mr. Liukonen will testify and offer opinions regarding Decedent's alleged exposure to asbestos, diesel or other fumes and gases, levels of alleged exposure, and whether exposure exceeded the permissible exposure levels in place during the relevant time period.	
10		Mr. Liukonen will also testify and offer opinions regarding that the training provided by Union Pacific's relevant predecessor to its employees during the relevant time period. He will also testify and offer opinions regarding Union Pacific's relevant predecessor's industrial hygiene and employee safety practices during the relevant time period. Mr. Liukonen will offer these opinions based upon his training, experience, education and review of publications, treaties and the medical, governmental	
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1		and scientific literature commonly relied upon by experts in his field in addition to the pleadings, discovery responses, depositions, documents and other tangible things produced or made available by any party in this litigation. He reserves the right to use any previously disclosed documents and/or appropriate demonstrative exhibits in support.	
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6	Gail Stockman, MD (Expert Testimony)	Pulmonologist Dr. Stockman may testify regarding the nature and cause of the Decedent's medical condition, other alternative causes of Decedent's medical condition, the effect of exposure to various substances on the development and manifestation of obstructive and restrictive conditions, diseases of the respiratory system, and related issues. Dr. Stockman is also expected to testify as to the State of the Art based upon her review of medical literature and her own personal experiences. Additionally, Dr. Stockman is expected to testify on issues related to epidemiology and as to the relationship, if any, between exposure to asbestos and diseases claimed by Plaintiffs.	Will Testify
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16	Michael Holland, MD (Expert Testimony)	Toxicologist Dr. Holland is board-certified in occupational medicine, toxicology, emergency medicine, and undersea and hyperbaric medicine. His qualifications are set forth in greater detail in his curriculum vitae, which will be furnished upon request. He may testify, generally, concerning the causation and diagnosis of asbestos-related disease, and specifically concerning his evaluation of plaintiff's/decedent's medical condition, including its relationship, if any, to exposure to particular asbestos-containing products. Dr. Holland may offer opinions concerning whether particular amounts of exposure to a particular asbestos-containing product are sufficient to have caused a particular asbestos-related disease, including mesothelioma. Dr. Holland may testify as to the toxicity of	Will Testify
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		asbestos to the respiratory system and the airways in the presence of asbestosis (and in the absence of asbestosis), and the injuries caused by this toxicity in the presence of asbestosis and relevance to cancer. Dr. Holland may also testify concerning the results of a fiber burden analysis in a given case. Dr. Holland may also testify regarding threshold limits and permissible exposure levels promulgated by private organizations and governmental agencies over the years, as well as, more generally, regarding ACGIH, EPA and OSHA reports, statements, guidelines and regulations concerning various asbestos containing products. Dr. Holland may also generally respond to or discuss the opinions offered by other experts who will be offering opinions in this case, and any related bases upon which they form their opinions, so far as they relate to his own field of expertise.	
Victor Roggli, MD (Expert Testimony)		Pathologist Dr. Roggli is a board certified pathologist. He will be prepared to offer his opinions as to the pathology of asbestos-related diseases, his review of pathology materials in this case, and the effects of exposure to asbestos-related products and as to certain conditions, the causation of Decedent's claimed injuries. In addition, Dr. Roggli may give testimony concerning asbestos-related or other related diseases and the effects of exposure to various asbestos-containing products upon persons in occupational settings. He may further testify regarding the criteria for diagnosis of asbestos-related disease.	Possible Testimony
Laura Dolan (Expert Testimony)		Economist Ms. Dolan is an economist who will testify regarding economic damage and losses and related matters as alleged by Plaintiffs, including but not limited to respond to Plaintiffs' economic loss allegations.	Possible Testimony

1 **VI. OTHER WITNESSES**

2 **(1) On behalf of Plaintiffs**

3 **A. Patrick Jack (will testify by video deposition)**

4 See transcripts. Mr. Jack will testify regarding his work and exposure to defendants'
5 asbestos-containing products, the lack of warnings, and the harm to himself and his family
6 resulting therefrom.
7

8 **B. Leslie Jack (will testify)**

9 Mrs. Jack will testify regarding her relationship with Mr. Jack. She will testify
10 regarding their family life and activities, including the love, care, comfort, affection,
11 protection, society, and moral support he provided to her before his illness and death. She
12 will testify regarding some of the aspects of Mr. Jack's pain, suffering, and mental anguish,
13 as well as her husband's physical impairment and loss of enjoyment of life. She may testify
14 regarding economic losses associated with her husband's illness, including medical and other
15 expenses. She will testify regarding the loss of care, maintenance, support, advice, counsel
16 and guidance she and Mr. Jack's son have suffered as a result of her husband's illness.
17

18 **C. David Jack (will testify)**

19 David Jack will testify regarding his relationship with his father. He will testify
20 regarding the family life and activities of his father, including the love and care his father
21 provided to him and his family. He may testify regarding his observation and understanding
22 of the physical pain and suffering and mental anguish his father endured as a result of
23 mesothelioma. He may testify regarding his father's physical impairment and loss of
24 enjoyment of life after his diagnosis with mesothelioma; and the loss of care, maintenance,
25
26

1 support, advice, counsel and guidance him and his family have lost due to his father's illness
2 and death.

3 **D. Judy Gilyeat (may testify live or by deposition)¹**

4 Judy Gilyeat may testify regarding Pat Jack's work with vehicles and his relationship
5 with David Jack.

6 **E. Colleen Tovar (may testify live)²**

7 Colleen Tovar may testify regarding Mr. Jack's relationship with her mother and her
8 mother's loss.

9 **F. Michael Tovar (may testify live)³**

10 Michael Tovar may testify regarding Mr. Jack's relationship with Leslie and David
11 Jack.

12 **G. Marcella Duncan (will testify)**

13 Marcella Duncan is defendant DCo's corporate representative with respect to its
14 Victor Gaskets division. DCo has agreed to bring her to trial to testify live during DCo's
15 presentation of evidence, and has agreed that it will not consider Plaintiffs' case against DCo
16 as rested until the conclusion of her testimony.. Portions of her videotaped deposition may
17 also be played.
18
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21 ¹ Union Pacific and DCo object to the purported testimony of Judy Gilyeat. Her purported testimony is
22 cumulative and duplicative of the testimony of either David Jack or Leslie Jack. Accordingly, the testimony
creates a danger of wasting time, causing undue delay, and needlessly presenting cumulative evidence. FRE
403.

23 ² Union Pacific and DCo object to the purported testimony of Colleen Tovar. Her purported testimony is
24 cumulative and duplicative of the testimony of either David Jack or Leslie Jack. Accordingly, the testimony
creates a danger of wasting time, causing undue delay, and needlessly presenting cumulative evidence. FRE
403.

25 ³ Union Pacific and DCo object to the purported testimony of Michael Tovar. His purported testimony is
26 cumulative and duplicative of the testimony of either David Jack or Leslie Jack. Accordingly, the testimony
creates a danger of wasting time, causing undue delay, and needlessly presenting cumulative evidence. FRE
403.

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H. Richard Meyers (may testify live or by deposition)

Richard Meyers may testify regarding Puget Sound Naval Shipyard and Mr. Jack's relationship with Leslie Jack, as well as Mr. Jack's automotive work.

I. Kathleen Blankenbaker (will testify)

Ms. Blankenbaker will testify regarding her care and treatment of Mr. Jack and her mother's relationship with him.

J. Witnesses by deposition

Plaintiffs understand that Defendants intend to offer exhibits and testimony regarding a variety of documents that Defendants will purport did or should have put Patrick Jack on notice of the dangers of dust, asbestos, and/or similar matters. These documents were intended for different trades, were not widely distributed, and were not seen by Mr. Jack. Plaintiffs oppose introduction of both such exhibits and testimony. Nevertheless, Plaintiffs have designated testimony regarding such documents, demonstrating among other things that such documents were not distributed. Whether Plaintiffs offer such testimony depends on the Court's evidentiary rulings and rulings on Plaintiffs' motions in limine. By designating this testimony, Plaintiffs do not waive their objections to such documents or testimony about them.

1. Richard Anderson (may testify by deposition and/or trial testimony)

Mr. Anderson will testify about Borg Warner's general use of asbestos in its products, Borg Warner's knowledge of the hazards of asbestos, the suppliers of asbestos and asbestos-containing products to Borg Warner, any actions taken by Borg Warner as a result of such knowledge, any measures taken by Borg Warner to provide warnings or reduce the use of

1 asbestos, Borg Warner's supply of asbestos-containing products to others, and Borg
2 Warner's documentary evidence on these topics.

3 **2. Gregory Bellopatrick (may testify by deposition and/or trial testimony)**

4 Mr. Bellopatrick will testify about Bendix's general use of asbestos in its products,
5 Honeywell/Bendix's knowledge of the hazards of asbestos, the suppliers of asbestos and
6 asbestos-containing products to Bendix, any actions taken by Bendix as a result of such
7 knowledge, any measures taken by Bendix to provide warnings or reduce the use of asbestos,
8 Bendix's supply of asbestos-containing products to others including other defendants, and
9 Bendix's documentary evidence on these topics.
10

11 **3. William Cline (may testify by deposition and/or trial testimony)**

12 Mr. Cline will testify about Borg Warner automatic clutches, the asbestos in Borg
13 Warner automatic clutches, Borg Warner's lack of testing of its products, Borg Warner's
14 documents and medical library, and Borg Warner's knowledge and notice that its employees
15 and former employees were developing asbestos-related diseases, including mesothelioma.
16

17 **4. Ralph Vernon David (may testify by deposition and/or trial testimony)**

18 See transcript.

19 **5. Edward Drislane (may testify by deposition and/or trial testimony)**

20 Mr. Drislane will testify about the Friction Materials Standards Institute (FMSI), its
21 members, and documentary evidence regarding the knowledge of FMSI and its members of
22 the hazards of asbestos, as well as efforts by FMSI and its membership to fight warning
23 requirements, regulations, and bans of asbestos in friction materials.
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1 **6. Marcy Duncan (may testify by deposition and/or trial testimony)**

2 Ms. Duncan will testify about Dana/Victor's general use of asbestos in its products,
3 Victor's knowledge of the hazards of asbestos, the suppliers of asbestos and asbestos-
4 containing products to Victor, any actions taken by Victor as a result of such knowledge, any
5 measures taken by Victor to provide warnings or reduce the use of asbestos, Victor's supply
6 of asbestos-containing products to others, and Victor's documentary evidence on these
7 topics.
8

9 **7. Earl E. Fowler (may testify by deposition and/or trial testimony)**

10 See transcript.

11 **8. Matthew Fyie (may testify by deposition and/or trial testimony)**

12 Mr. Fyie will testify about Ford's general use of asbestos in its products, Ford's
13 knowledge of the hazards of asbestos, any actions taken by Ford as a result of such
14 knowledge, any measures taken by Ford to provide warnings or reduce the use of asbestos,
15 the suppliers of asbestos and asbestos-containing products to Ford, Ford sale and distribution
16 of asbestos-containing products to others, the availability and Ford's use of asbestos-free
17 alternatives, and Ford's documentary evidence on these topics.
18

19 **9. Glenn M. Hassebrock (may testify by deposition and/or trial testimony)**

20 Plaintiff anticipates PSNS testimony and exhibits related thereto proffered in this
21 case will not be inadmissible. In the event the evidence comes in, Plaintiff may offer the
22 testimony of Mr. Hassebrock. See transcripts.
23

24 **Thomas A. Johnson (may testify by former deposition and/or trial testimony)**

25 Plaintiff anticipates the PSNS testimony and exhibits related thereto proffered in this case
26

1 will not be nadmissible. In the event the evidence comes in, Plaintiff may offer the testimony
2 of Mr. Hassebrock. See transcripts.

3 **10. Philip Konrad (may testify by deposition and/or trial testimony)**

4 Mr. Konrad will testify regarding Borg Warner's asbestos-containing brakes, their
5 asbestos-content, percentage of asbestos, source of asbestos, and supply to Ford, as well as
6 ventilation and dust control in Borg Warner's manufacturing facilities.
7

8 **11. Terry Lindquist (may testify by deposition and/or trial testimony)**

9 Mr. Lindquist may testify about Borg Warner's supply of asbestos-containing
10 clutches to various manufacturers, including Ford, Pontiac, and others. He may testify
11 regarding Borg Warner's lack of testing of its clutches for asbestos hazards, years of
12 asbestos-content, warnings, dust and dust measurement, scope of operations, membership in
13 various trade organizations, and Borg Warner's largest customers.
14

15 **12. Louis Merz (may testify by deposition and/or trial testimony)**

16 Mr. Merz will testify about Borg Warner's general use of asbestos in its products,
17 Borg Warner's knowledge of the hazards of asbestos, the suppliers of asbestos and asbestos-
18 containing products to Borg Warner, any actions taken by Borg Warner as a result of such
19 knowledge, any measures taken by Borg Warner to provide warnings or reduce the use of
20 asbestos, Borg Warner's supply of asbestos-containing products to others, and Borg
21 Warner's documentary evidence on these topics.
22

23 **13. Peter Novak (may testify by deposition and/or trial testimony)**

24 Mr. Novak will testify regarding Viad Corp's use of asbestos in its products,
25 specification of asbestos in its products, knowledge of the hazards of asbestos in its products,
26

1 any actions taken or cautions or warnings regarding asbestos in its products, and any
2 documentary evidence relating to these topics.

3 **14. Paul F. Page (may testify by deposition and/or trial testimony)**

4 See transcript.

5 **15. Richard Radlinski (may testify by deposition and/or trial testimony)**

6 Mr. Radlinski may testify regarding the availability of alternatives to asbestos-
7 containing friction products.
8

9 **16. Eugene Rogers (may testify by deposition and/or trial testimony)**

10 Mr. Rogers will testify about the time period when Bendix's brakes contained
11 asbestos and the percentage of Bendix's brakes that contained asbestos in various time
12 periods. He may also testify about the time period when companies were aware of the
13 hazards of asbestos, and the suppliers of raw asbestos fiber to Bendix, including Johns
14 Manville.
15

16 **17. Keith Wagner (will testify by deposition and/or trial testimony)**

17 Mr. Wagner will testify regarding Union Pacific's business, the steam era, asbestos
18 materials at Union Pacific jobsites, Edwin Jack's employment with Union Pacific, job
19 responsibilities of the water service department, Union Pacific Asbestos Safety Policy, Union
20 Pacific knowledge about the hazards of asbestos, Union Pacific's membership in the
21 Association of American Railroads, and what Union Pacific did to protect its workers from
22 the hazards of asbestos.
23

24 **(2) On behalf of Defendants**

25 **BorgWarner Morse TEC, LLC**

- 26 1. Patrick Jack (will testify by video / deposition transcript)

1 Mr. Jack will testify concerning his potential asbestos exposures and other
2 matters pertinent to this action, including those set forth in his deposition.

3 2. Robert Hornick
4

5 Mr. Hornick is BWMT's corporate representative. Mr. Hornick may testify
6 regarding the matters discussed during his deposition as well as those subjects
7 identified in discovery responses and prior disclosures.

8 **DCo, LLC**

9 1. Marcy Duncan will testify live at trial and/or via her deposition testimony per her
10 deposition taken on July 24, 2018.

11 2. Patrick Jack [deceased] will testify at trial via his deposition transcripts dated June 19,
12 2017, June 20, 2017, June 21, 2017, June 22, 2017, June 27, 2017, June 28, 2017, June 29,
13 2017 and June 30, 2017.

14 3. David Jack, 5208 26th Avenue SE, Lacey, WA. Mr. Jack will testify at trial live
15 and/or via his deposition transcript taken June 15, 2018 regarding his father, Patrick Jack's
16 alleged exposures to asbestos-containing products and his mesothelioma.
17

18 In addition to the above witnesses, DCo has made or joined in designations of
19 deposition testimony and counterdesignations of deposition testimony, which deponents
20 therefore would be called as witnesses in that manner by DCo.

21 DCo joins in Plaintiffs' page and line designations of various witnesses who will
22 provide testimony other than as to DCo. DCo may withdraw its joinder of some witnesses
23 depending on whether certain entities remain at trial.
24

25 **Viad Corp**
26

1 The deposition transcripts Viad may use have previously been forwarded to all parties
2 and highlighted in accordance with LCR 32

3 A. Peter Novak depositions of December 1, 2004 in *Payne* and October 16, 2007 in
4 *Andregg*.

5
6 **Ford Motor Company**

7
8 Ford may use one or more of the deposition transcripts of PSNS workers referenced
9 in Plaintiffs' Supplemental Answers to Style Interrogatory Nos. 11, 12 and 13, served June
10 16, 2017 (Plaintiffs' Supplemental Answers), at 11-14. Plaintiffs' Supplemental Answers list
11 the following PSNS workers as "possible witnesses," describe for each the time periods
12 involved and the particular amphibole asbestos-containing products each identifies: Monty
13 Anderson; Earl Fowler; Maurice Lane; Robert Leonard; John Northey; James Stark; Larry
14 Stimmel; Hugh Tefft; Richard Walmach; Melvin Wortman; and Roy Yager. Plaintiffs'
15 Supplemental Answers list the referenced deposition transcripts in their entirety. Therefore,
16 subject to refinement as the case nears trial, Ford presently joins in the designation of all of
17 the referenced transcripts. In any event, Ford's experts may rely in whole or in part on these
18 transcripts in their testimony. Plaintiffs presumably have these transcripts because they
19 referenced them in their Supplemental Answers over a year ago. (Plaintiff highlights its
20 reponse: Plaintiff has objected to Ford's designation: by taking a voluntary discovery
21 response from Plaintiff and claiming that to be the equivalent of having designated a
22 deposition in its entirety, Ford has designated over 2,000 pages and identified they will
23 provide their actual designations as trial nears, something Ford asked for previously —
24 designations served late—the Court previously rejected, ordering them due now. Dkt.#655 .
25 Plaintiff sees Ford's act as a non-designation, one that runs afoul of the Court's order.)
26 Ford will serve deposition counterdesignations in accord with LCR 32(e), including those
relating to decedent Patrick Jack.

Union Pacific Railroad Company

Name	Party Calling	Brief Description of Testimony	Will Testify or Possible Testimony
Union Pacific Corporate Representative	Union Pacific	Testimony of Corporate Representative	May Testify
Decedent Patrick Jack	Union Pacific	Union Pacific will read portions of the deposition of Decedent, Patrick Jack.	Will Testify Via Deposition or Videotape. Union Pacific will serve objections and counter designations pursuant to Court order.

XVI. EXHIBIT LISTS

(a) Admissibility stipulated:

Plaintiffs' Exhibits

Ex. #	Description	Stipulation?
1	Photographs of Pat Jack and his mother.	BWMT: No DCo: No Ford: Yes UPRC: No Viad: Yes
2	Photographs of Pat Jack and his father.	BWMT: No DCo: No Ford: Yes UPRC: No Viad: Yes
3	Edwin A. Jack Union Pacific Railroad Company Plaque and photograph.	BWMT: No DCo: No Ford: Yes UPRC: No Viad: Yes
5	Photographs of Mr. Jack's home garages	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes

6	Photographs of Box of Victor Gaskets, Victor Gaskets, and other gaskets from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
7	Photographs of scraping tools from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
8	Photographs of wire brushes from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
9	Photograph of large wire brush from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
10	Photographs of various clutch discs and clutch plates from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
11	Photographs of Mr. Jack's electric grinder, attachments, tool cabinet, and air compressor.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
12	Photographs of brake shoes and drums from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
13	Photographs of various files and rasps from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
14	Photograph of brake pads from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
15	Photographs of Mr. Jack and David Jack.	BWMT: No DCo: No Ford: Yes UPRC: No Viad: Yes
16	Photographs of Mr. and Mrs. Jack.	BWMT: No DCo: No Ford: Yes UPRC: No Viad: Yes

1	19	October 1999 and September 2005 Issues of High Performance Pontiac.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
2	20	Photograph of Pat Jack in family home after auto repair work.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
3	21	Bremerton Gasket Study – Asbestos Exposure From Gasket Operations – VPD-153-0001000 –	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
4	38	Letter from E.W. Drislane (Friction Materials Standards Institute- FMSI) to J.H. Kelly (Bendix Corporation). Re: "Discussion concerning labeling requirements where brake linings are being shipped to customers." Date: November 28, 1972.	BWMT: Yes DCo: No Ford: No UPRC: Yes Viad: No
5	39	Borg Warner Inter-Office correspondence to R.L. Kristufek from J.D. Dresser. Subject: Asbestos Program. Attachment: "Asbestos Fiber Study for Borg and Beck Division Borg-Warner Corporation, Chicago, Illinois" by the National Loss Control Service Corporation. Date: November 28, 1972. (BW 5067)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
6	40	"Asbestos Exposure during Brake Lining Maintenance and Repair," by Arthur N. Rohl, et al. Environmental Research (1975)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
7	41	"Asbestos Exposure of Brake Repair Workers in the United States," by William V. Lorimer and Irving Selikoff, et al. The Mount Sinai Journal of Medicine, Vol. 43, No. 3 May-June 1976.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
8	42	"Asbestos Exposure during Brake Lining Maintenance and Repair," by Arthur Rohl, et al. Environmental Research (1976)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
9	43	Johnson & Zumwalde, Industrial Hygiene Assessment of Seven Brake Servicing Facilities. Date: January 29, 1979.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
10	44	Industrial Hygiene Report Asbestos, Assessment "of Asbestos Exposure to Mechanics Performing Brake Service Operations." Report Written by: Dennis Roberts, Ralph Zumwalde. Date: April 27, 1981. Report# 32.4	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
11	45	"Mesothelioma in a Brake Repair Worker," by A.M. Langer. The Lancet, November 13, 1982.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
12	46	"Industrial Hygiene Summary Report of Asbestos Exposure Assessment for Brake Brake Mechanics," by Dennis R. Roberts, Ralph D. Zumwalde. Report #32.4. Date: November 22, 1982.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

1	47	EPA Gold Book, "Guidance for Preventing Asbestos Disease Among Auto Mechanics", EPA 560 OPTS 86 002. Date: June 1986	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
2			
3	53	Ford MSDS Sheet: Ford Motor Company, Brake Shoe Set, Hazardous Materials Information System. Date: July 1998. (FD 6020)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: Yes
4			
5	54	"Characterization of Vehicular Brake Service Personnel Exposure to Airborne Asbestos and Particulate," Published in <i>Applied Occupational and Environmental Hygiene</i> . Authors: Weir, Tolar, Meraz (2001)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
6			
7	57	"Asbestos in Brakes: Exposure and Risk of Disease," by Richard A. Lemen, MD; Am. J. of Ind. Med. (2004)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
8			
9	58	S/P2 Ford endorsement: "Ford Motor Company Advocates CCAR's "S/P2" Training to Ford and Lincoln-Mercury Dealers," Date: February 8, 2005.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
10			
11	61	"Ford, General Motors, Chrysler, Asbestos, and a 'Sane Appreciation of the Risks,'" by David Egilman, MD, MPH. Published in <i>Int. J. of Occup. And Environ. Health</i> , Vol. 15, No. 1, pp. 103-04. Date: January/March 2009.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
12			
13	62	Honeywell/Bendix MSDS (Material Safety Data Sheet). Product name: "Cured Organic Segment/Drum Brake – Asbestos." No date. (BX 5059)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
14			
15	63	Friction Materials Work Practices Guide, October 1978	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
16			
17	64	Allied Automotive Authorization for Check payable to Color Film Corporation - Video Division for EPA Videotape "Don't Blow It" dated April 6, 1987	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
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19	65	Letter dated Sept. 12, 1966, to Noel Hendry from E. A. Martin with enclosure: Article entitled "Asbestos: Awaiting 'Trial.'" (<i>Exhibit 4 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner</i>). <i>Authenticated by M. Baumgardner - see BX 5055, dated 1/8/08.</i>	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
20			
21	66	HSE Management System Level 2 Standard, Industrial Hygiene, Asbestos, effective date January 31, 2013	BWMT: No DCo: No Ford: No UPRC: No Viad: No
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1	71	Intra-Company Communication – June 15, 1982 (Subject-Asbestos Free Materials)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
2			
3	72	Intra-Company Communication – September 28, 1982 (Subject-Product Liability Insurance)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
4			
5	73	Letter from Ellsworth to North – October 1, 1982 (Subject-Asbestos Labeling)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
6			
7	74	Letter from North to Budovec – October 5, 1982 (Subject-Asbestos Labeling)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
8			
9	75	Intra-Company Communication – March 18, 1983 (Subject-Asbestos Replacement Fibers)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
10			
11	76	Intra-Company Communication - November 17, 1989 (Subject-Obsolete Asbestos Chicago Stock)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
12			
13	77	Intra-Company Communication - January 17, 1990 (Subject-Obsolete Asbestos Chicago Stock)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
14			
15	78	Intra-Company Communication - February 26, 1990 (Subject-Asbestos Bearing Material)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
16			
17	79	Subject-Asbestos Free Gaskets - May 11, 1990	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
18			
19	80	Victor Gasket Motto	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
20			
21	81	Production of Gasket #17437 & #12032 for Allis-Chaimers Dec. 16, 1948	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
22			
23	82	Memo from Kapps to Lillis RE Changing to Victopac Aug 16, 1965	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
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83	Ltr from Drinkwater to North attaching OSHA-20 forms 8-14-78	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
84	Memo from North to Norman RE Hollingsworth & Vose dropped by insurance 8-6-82	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
85	Current intelligence Bulletin 5 "Asbestos exposure during servicing of motor vehicle brake and clutch assemblies 8-8-75	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
86	Agreement Dana and Ford RE Asbestos containing materials	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
87	Dana Technical Centers	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
88	Kelleher to File RE April 14 call on Zeitz 4-28-78	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
89	Cost comparison chart for Victopac	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
90	Memo from Ulrich to Damusis RE Frenzelit regarding asbestos products 5- 31-83	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
91	Organizational Charts 9-1-78	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
92	Victor Gasket Sheet Packings Industrial Gaskets and Washers Catalog 505A and 505B November 1963	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
93	Memos to North Re 1974 Material Forecast 11-29-73	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
94	Employee file and occupational claim- Irving B. Adler 12-18-72	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

95	Brochure- Victor Gaskets- 50 years in sealing products (1959)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
96	Victor Catalog- You know we're number 1.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
97	Memo from Norris to Commanders-In- Chief Re Contracts for boiler gaskets, 1927.6-29-26	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
99	Dana Ann Rept, Fisc yr ended 8-31-67	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
100	Obsolete Product formula 1965-1967	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
101	Victopac 1 MSDS 3-14-85	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
102	Victopac 6 MSDS 3-14-85	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
103	Victopac 6W MSDS 3-14-85	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
104	Letter from Ulfing to Caterpillar announcing elimination of asbestos out of all parts except head gaskets (IE607) 8/12/1982	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
105	Letter from Ulfing to Caterpillar 4/11/1985	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
106	Memo from Dana Corporation to non- asbestos Committee Members Robinson Staff regarding Asbestos Labels for Caterpillar-DADD- Roger Moss sent to 1/8/1985	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
107	Memo from Fell re: non-asbestos alternatives 3/16/1984	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

108	(1982) Letters from Dana-Victor (VPD- 11-0000141-0000151)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
109	(1971) Victor Supplement to Passenger Car Catalog (Partial)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
110	(1984) Victor High Performance Gaskets Catalog	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
111	(1971) Victor Gaskets & Oil Seals Catalog (Partial)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
112	(08-04-1954) Letter from Johnson Company (VMG-02-0000052-0000055)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
113	(02-20-1956) Asbestos Fiber Test Results (VMG-02-0000107-0000113)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
114	(06-21-1955) Memo Re NARCO (VMG-42-0001065)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
115	(11-15-1960) Memo Re Chemical R&D (VMG-42-0001072-0001077)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
116	(01-12-1980) Memo from Larson to Zeitz (VPD-29-0001155)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
117	(06-13-1983) Memo from Ulrich Re Asbestos Free (VPD-40-0000159- 0000165)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
118	(07-08-1985) Handwritten Note by Tom to Ulrich (VPD-40-0000245)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
119	(1977) Monies Paid to Vendors by H.G.North (VPD-54-0002521-0002542)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

120	(1978) Monies Paid to Vendors by H.G.North (VPD-54-0002706-0002727)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
121	(11-17-1985) Rick DeVirgilio Memo Re Inventory Control (VPD-58- 0000858-0000859)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
122	(01-28-1985) G. Fell Memo Re Aftermarket Task Force (VPD-63- 0001169-0001172)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
123	(Feb 1987) Article – Controlling Deadly Asbestos by Joe Woods	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
124	(01-21-1981) Engine News (VPD-145- 0002712-0002717)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
125	Redacted Medical Records - Victor Employees	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
126	(10-19-1982) Marshall Letter Re Asbestos Liability (VPD-275-0000108- 0000109)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
127	(1977) Safety Misc File (VPD-277- 0000158-0000185)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
128	(07-14-1977) Minutes of Victor Products Division Plant Safety Committee Meeting (VPD-277- 0000196-0000198)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

129	(1973) OEM Total Customer Sales (VPD-288-00002096-00002098)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
130	Memo - Scanlon to Franklin re: Asbestos Related Matters, 3/12/84 (first page only)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
131	Material Safety Data Sheets - GAF Corporation, 10/27/77, 1/6/78	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
132	Memo: October 6, 1972	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
133	Memo: June 9, 1980	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
134	Memo: NIOSH Notes	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
135	Memo: June 6, 1984	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
136	Memo: June 21, 1984	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
137	Memo: February 8, 1985	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

138	GM Presentation, May 21, 1986	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
139	Material Cost for Aftermarket Conversion to Non-Asbestos	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
140	Depiction of Brake Assembly and Components	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
141	June 1, 1983 Letter from the Industrial Health Foundation	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
142	Bibliography on Carcinogenic Effects of Asbestos Dust, dated 1954-1965	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
143	Bibliography on Carcinogenic Effects of Asbestos or Asbestos Dust Supplement 1: 1965 to July 1970	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
144	Letter from Gealer to the Executive Director of the Girl Scouts of Metropolitan Detroit, November 2, 1970.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
145	Letter from Mt. Sinai School of Medicine, Dr. Irving Selikoff, to the Girl Scouts of the U.S.A. in New York City, November 16, 1970.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
146	Letter from Dr. Gealer at Ford to the Merrill-Palmer Institute in Detroit, Michigan, May 6, 1971	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

147	"Exposure to Asbestos During Brake Maintenance: D.E. Hickish and K.L. Knight, Medical Services, Ford of Britain; Brentwood Essex," 1970	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
148	Intra Company Ford Memo by Dr. Lick, Industrial Hygienist, "Evaluation of Asbestos Worker Exposure, Brake Research Unit, Scientific Building," February 20, 1970	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
149	NIOSH Cartoon Publication, 1972	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
150	Ford Memo by Mr. Toth, Supervisor Industrial Hygiene Section, dated August 3, 1973.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
151	Maintenance Bulletin from Mr. Toth, Ford Plant Engineering Office Manufacturing Staff, August of 1973	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
152	Memo from Industrial Hygienist Charles Plaster to Mr. Keller, Supervisor of Personnel Services, re "Asbestos in Air Sampling - Research and Engineering Center," August 20, 1973	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
153	Memo from Norman Brusk, Ford Industrial Hygienist, to Mr. R.D. Byrom, Division Safety Engineer, November 8, 1973	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
154	Manual entitled, "Drum and Disc Brakes," June of 1974	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
155	Ford Memo from J.R. Krauss, "Controlling Asbestos Exposure."	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

156	Ford Memo from Paul J. Ryder to Mr. E.W. Preston, July 16, 1974.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
157	Ford Memo from Mr. Toth, Supervisor Industrial Hygiene Section, to Mr. Cole, Chemistry Department, Scientific Research Staff, April 23, 1975.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
158	Three Memos, attached as Exhibit 13, to 2/13/18 Deposition of Ford in the Brown matter, July 15, 1975.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
162	Ford Technical Service Bulletin No. 99, October 24, 1975.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
163	Letter/Memo from Liberty Mutual to Ford Dealer Development Dealership Presidents, December 29, 1975.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
164	Brake lining dust removal survey	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
165	Memo dated June 4, 1975, Bates Nos. FAFD0017096 to 17097	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
166	Memo from R.E. Donly dated July 8, 1976, Bates Nos. FAFD0002864 to 2869	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
167	Memo from D.P. Cratty dated May 10, 1977	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

168	Inter-office memo. To: R.M. McCaffery, Manager Fairfax Transmission Plant. From Keith Lee, Industrial Hygienist. Subject:	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
169	Inter-office memo. To: C. Roth, Manager , Kentucky Truck Plant. From: James M. Sproat, Industrial Hygienist. Subject: An Industrial	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
170	Memo dated January 30, 1980, Bates Nos. FAFD 0017190 to 17192	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
171	Plant Engineering Letter, Letter No. 80-1, March 17, 1980, Bates Nos. FAFD0008369 to 8373	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
172	Subcommittee Carcinogens in the Workplace Task Force Report	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
173	Script for a Slide Presentation Titled "Working with Asbestos"	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
174	Ford Memorandum from H.B. Lick, dated 9/20/83	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
175	Technical Service Bulletin, Bulletin Number 83-22, November 1, 1983	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
176	Typewritten document, Asbestos Removal from Product Materials	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

177	Memo from Roger L., Wabeke dated February 20, 1987	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
178	Industrial Relations Bulletin dated 10/14/86	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
179	Industrial Relations Bulletin dated 10/14/86	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
181	Manufacturing Guideline No. G3-19 dated June 1988	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
182	Ford training manual	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
183	General brakes theory and operation, self-study student reference book	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
184	Manufacturing Guideline, No. G3-19 dated February 1995	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
185	Advanced Brake Systems Diagnosis and Services, Student Guide	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
186	Ford Electronic Field Communication	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

187	S/P2 Safety and Pollution Prevention, press release dated February 8, 2005	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
188	S/P2 Safety and Pollution Prevention, press release dated March 14, 2005	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
189	S/P2 Mechanical Pollution Prevention Asbestos	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
190	LLP, to Weitz & Luxenberg, P.C., Jerry Kristal, dated January 15, 2014	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
191	Asbestos - Automotive Brake and Clutch Repair Work, Safety and Health Information Bulletin	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
192	EPA, Current Best Practices for Preventing Asbestos Exposure Among Brake and Clutch Repair Workers	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
193	American Journal of Industrial Medicine 45:229-237 (2004), Asbestos in Brakes: Exposure and Risk of Disease	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
194	Ford Motor Company, Privilege Log re CCAR/SP2	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
195	Decision and Order, Re: Cepeda vs. AC&S and Bisman vs. AC&S	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

196	Ford Motor Company, Electronic Field Communication dated 06/13/2007	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
197	Mudd, LLC vs. Ford Motor Company, et al., Ford Motor Company's First Supplemental Responses to Plaintiffs' Supplemental Request	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

Defendants' Exhibits

Ford Motor Company

A-519	FORD GEN-19	Handwritten notes dated August 26, 1971 regarding telephone call with Dr. Colin Harwood
A-552	FORD GEN-52	Package Material Specifications. Revisions to L-1516 dated August 21, 1980
A-563	FORD SUPP-2	Plaintiffs' Supplemental Answers to Style Interrogatory Nos. 11, 12 and 13, dated June 16, 2017
A-570	FORD SUPP-9	Jack Handwritten List (Ex. 1 to Decedent Patrick Jack's 6.21.2017 Deposition)

(b) Authenticity stipulated, admissibility disputed:

Plaintiffs' Exhibits⁴

Ex. #	Description	Stipulation?
6	Photographs of Box of Victor Gaskets, Victor Gaskets, and other gaskets from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

⁴ Plaintiffs give notice here that it respectfully object to the Court having limited its evidence in advance of trial on two grounds: 1) the ruling was an evidentiary restriction but lacked an evidentiary basis for the ruling; and 2) the ruling applied to only Plaintiffs. Plaintiffs will make an offer of proof(s) and more fully develop this argument.

7	Photographs of scraping tools from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
8	Photographs of wire brushes from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
9	Photograph of large wire brush from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
10	Photographs of various clutch discs and clutch plates from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
11	Photographs of Mr. Jack's electric grinder, attachments, tool cabinet, and air compressor.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
12	Photographs of brake shoes and drums from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
13	Photographs of various files and rasps from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
14	Photograph of brake pads from Mr. Jack's home garages.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
15	Photographs of Mr. Jack and David Jack.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

16	Photographs of Mr. and Mrs. Jack.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
18	Patrick Jack History and Physical Examination from Kitsap Internal Medicine Associates, Inc., 8/29/1990.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
19	October 1999 and September 2005 Issues of High Performance Pontiac.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
20	Photograph of Pat Jack in family home after auto repair work.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
21	Bremerton Gasket Study – Asbestos Exposure From Gasket Operations – VPD-153-0001000 –	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
38	Letter from E.W. Drislane (Friction Materials Standards Institute- FMSI) to J.H. Kelly (Bendix Corporation). Re: "Discussion concerning labeling requirements where brake linings are being shipped to customers." Date: November 28, 1972.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
39	Borg Warner Inter-Office correspondence to R.L. Kristufek from J.D. Dresser. Subject: Asbestos Program. Attachment: "Asbestos Fiber Study for Borg and Beck Division Borg-Warner Corporation, Chicago, Illinois" by the National Loss Control Service Corporation. Date: November 28, 1972. (BW 5067)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
40	"Asbestos Exposure during Brake Lining Maintenance and Repair," by Arthur N. Rohl, et al. Environmental Research (1975)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
41	"Asbestos Exposure of Brake Repair Workers in the United States," by William V. Lorimer and Irving Selikoff, et al. The Mount Sinai Journal of Medicine, Vol. 43, No. 3 May-June 1976.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

42	"Asbestos Exposure during Brake Lining Maintenance and Repair," by Arthur Rohl, et al. Environmental Research (1976)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
43	Johnson & Zumwalde, Industrial Hygiene Assessment of Seven Brake Servicing Facilities. Date: January 29, 1979.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
44	Industrial Hygiene Report Asbestos, Assessment "of Asbestos Exposure to Mechanics Performing Brake Service Operations." Report Written by: Dennis Roberts, Ralph Zumwalde. Date: April 27, 1981. Report# 32.4	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
45	"Mesothelioma in a Brake Repair Worker," by A.M. Langer. The Lancet, November 13, 1982.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
46	"Industrial Hygiene Summary Report of Asbestos Exposure Assessment for Brake Brake Mechanics," by Dennis R. Roberts, Ralph D. Zumwalde. Report #32.4. Date: November 22, 1982.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
47	EPA Gold Book, "Guidance for Preventing Asbestos Disease Among Auto Mechanics", EPA 560 OPTS 86 002. Date: June 1986	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
51	VIDEO: MAS Work Practice Study, "Carlisle Brake Shoe and Fel-Pro Gasket Clean-up." Date: 1997	BWMT: No DCo: No Ford: No UPRC: No Viad: Yes
52	VIDEO: MAS Work Practice Study, "Bendix Brakes For Ford Vehicles." Date: 1997	BWMT: No DCo: No Ford: No UPRC: No Viad: Yes
53	Ford MSDS Sheet: Ford Motor Company, Brake Shoe Set, Hazardous Materials Information System. Date: July 1998. (FD 6020)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

54	"Characterization of Vehicular Brake Service Personnel Exposure to Airborne Asbestos and Particulate," Published in Applied Occupational and Environmental Hygiene. Authors: Weir, Tolar, Meraz (2001)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
55	VIDEO: MAS Work Practice Study, "Hand Sanding of Brake Shoes." Date: March 2001.	BWMT: No DCo: No Ford: No UPRC: No Viad: Yes
57	"Asbestos in Brakes: Exposure and Risk of Disease," by Richard A. Lemen, MD; Am. J. of Ind. Med. (2004)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
58	S/P2 Ford endorsement: "Ford Motor Company Advocates CCAR's "S/P2" Training to Ford and Lincoln-Mercury Dealers," Date: February 8, 2005.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
61	"Ford, General Motors, Chrysler, Asbestos, and a 'Sane Appreciation of the Risks,'" by David Egilman, MD, MPH. Published in Int. J. of Occup. And Environ. Health, Vol. 15, No. 1, pp. 103-04. Date: January/March 2009.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
62	Honeywell/Bendix MSDS (Material Safety Data Sheet). Product name: "Cured Organic Segment/Drum Brake – Asbestos." No date. (BX 5059)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
63	Friction Materials Work Practices Guide, October 1978	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
64	Allied Automotive Authorization for Check payable to Color Film Corporation - Video Division for EPA Videotape "Don't Blow It" dated April 6, 1987	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

65	Letter dated Sept. 12, 1966, to Noel Hendry from E. A. Martin with enclosure: Article entitled "Asbestos: Awaiting 'Trial.'" (Exhibit 4 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). Authenticated by M. Baumgardner - see BX 5055, dated 1/8/08.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
69	What Will Replace Asbestos Gaskets John e. Zeitz – July 1980	BWMT: No DCo: Yes Ford: No UPRC: No Viad: No
70	Letter-Neil, Armstrong to North, Victor Products; April 1, 1982 (Subject- Asbestos Content Label)	BWMT: No DCo: Yes Ford: No UPRC: No Viad: No
71	Intra-Company Communication – June 15, 1982 (Subject- Asbestos Free Materials)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
72	Intra-Company Communication – September 28, 1982 (Subject- Product Liability Insurance)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
73	Letter from Ellsworth to North – October 1, 1982 (Subject- Asbestos Labeling)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
74	Letter from North to Budovec – October 5, 1982 (Subject- Asbestos Labeling)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
75	Intra-Company Communication – March 18, 1983 (Subject- Asbestos Replacement Fibers)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
76	Intra-Company Communication - November 17, 1989 (Subject- Obsolete Asbestos Chicago Stock)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
77	Intra-Company Communication - January 17, 1990 (Subject- Obsolete Asbestos Chicago Stock)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No

78	Intra-Company Communication - February 26, 1990 (Subject-Asbestos Bearing Material)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
79	Subject-Asbestos Free Gaskets - May 11, 1990	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
80	Victor Gasket Motto	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
81	Production of Gasket #17437 & #12032 for Allis-Chaimers Dec. 16, 1948	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
82	Memo from Kapps to Lillis RE Changing to Victopac Aug 16, 1965	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
83	Ltr from Drinkwater to North attaching OSHA-20 forms 8-14-78	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
84	Memo from North to Norman RE Hollingsworth & Vose dropped by insurance 8-6-82	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
85	Current intelligence Bulletin 5 "Asbestos exposure during servicing of motor vehicle brake and clutch assemblies 8-8-75	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
86	Agreement Dana and Ford RE Asbestos containing materials	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
87	Dana Technical Centers	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
88	Kelleher to File RE April 14 call on Zeitz 4-28-78	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No

89	Cost comparison chart for Victopac	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
90	Memo from Ulrich to Damusis RE Frenzelit regarding asbestos products 5- 31-83	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
91	Organizational Charts 9-1-78	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
92	Victor Gasket Sheet Packings Industrial Gaskets and Washers Catalog 505A and 505B November 1963	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
93	Memos to North Re 1974 Material Forecast 11-29-73	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
94	Employee file and occupational claim- Irving B. Adler 12-18-72	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
95	Brochure- Victor Gaskets- 50 years in sealing products (1959)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
96	Victor Catalog- You know we're number 1.	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
97	Memo from Norris to Commanders-In- Chief Re Contracts for boiler gaskets,1927.6-29-26	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
98	Death Certificate- Ed Stempien 10-21- 85	BWMT: No DCo: Yes Ford: No UPRC: No Viad: No
99	Dana Ann Rept, Fisc yr ended 8-31-67	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No

100	Obsolete Product formula 1965-1967	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
101	Victopac 1 MSDS 3-14-85	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
102	Victopac 6 MSDS 3-14-85	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
103	Victopac 6W MSDS 3-14-85	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
104	Letter from Ulfig to Caterpillar announcing elimination of asbestos out of all parts except head gaskets (IE607) 8/12/1982	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
105	Letter from Ulfig to Caterpillar 4/11/1985	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
106	Memo from Dana Corporation to non- asbestos Committee Members Robinson Staff regarding Asbestos Labels for Caterpillar-DADD- Roger Moss sent to 1/8/1985	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
107	Memo from Fell re: non-asbestos alternatives 3/16/1984	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
108	(1982) Letters from Dana-Victor (VPD- 11-0000141-0000151)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
109	(1971) Victor Supplement to Passenger Car Catalog (Partial)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
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115	(11-15-1960) Memo Re Chemical R&D (VMG-42-0001072-0001077)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
116	(01-12-1980) Memo from Larson to Zeitz (VPD-29-0001155)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
117	(06-13-1983) Memo from Ulrich Re Asbestos Free (VPD-40-0000159- 0000165)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
118	(07-08-1985) Handwritten Note by Tom to Ulrich (VPD-40-0000245)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
119	(1977) Monies Paid to Vendors by H.G.North (VPD-54-0002521- 0002542)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
120	(1978) Monies Paid to Vendors by H.G.North (VPD-54-0002706- 0002727)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
121	(11-17-1985) Rick DeVirgilio Memo Re Inventory Control (VPD-58- 0000858-0000859)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No

122	(01-28-1985) G. Fell Memo Re Aftermarket Task Force (VPD-63- 0001169-0001172)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
123	(Feb 1987) Article – Controlling Deadly Asbestos by Joe Woods	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
124	(01-21-1981) Engine News (VPD-145- 0002712-0002717)	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
125	Redacted Medical Records - Victor Employees	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
126	(10-19-1982) Marshall Letter Re Asbestos Liability (VPD-275- 0000108- 0000109)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
127	(1977) Safety Misc File (VPD-277- 0000158-0000185)	BWMT: No DCo: Yes (partial) Ford: No UPRC: Yes Viad: No
128	(07-14-1977) Minutes of Victor Products Division Plant Safety Committee Meeting (VPD-277- 0000196-0000198)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
129	(1973) OEM Total Customer Sales (VPD-288-00002096-00002098)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
130	Memo - Scanlon to Franklin re: Asbestos Related Matters, 3/12/84 (first page only)	BWMT: No DCo: Yes Ford: No UPRC: Yes Viad: No
131	Material Safety Data Sheets - GAF Corporation, 10/27/77, 1/6/78	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
132	Memo: October 6, 1972	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No

133	Memo: June 9, 1980	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
134	Memo: NIOSH Notes	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
135	Memo: June 6, 1984	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
136	Memo: June 21, 1984	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
137	Memo: February 8, 1985	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
138	GM Presentation, May 21, 1986	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
139	Material Cost for Aftermarket Conversion to Non-Asbestos	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
140	Depiction of Brake Assembly and Components	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
141	June 1, 1983 Letter from the Industrial Health Foundation	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
142	Bibliography on Carcinogenic Effects of Asbestos Dust, dated 1954-1965	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
143	Bibliography on Carcinogenic Effects of Asbestos or Asbestos Dust Supplement 1: 1965 to July 1970	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

144	Letter from Gealer to the Executive Director of the Girl Scouts of Metropolitan Detroit, November 2, 1970.	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
145	Letter from Mt. Sinai School of Medicine, Dr. Irving Selikoff, to the Girl Scouts of the U.S.A. in New York City, November 16, 1970.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
146	Letter from Dr. Gealer at Ford to the Merrill-Palmer Institute in Detroit, Michigan, May 6, 1971	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
147	"Exposure to Asbestos During Brake Maintenance: D.E. Hickish and K.L. Knight, Medical Services, Ford of Britain; Brentwood Essex," 1970	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
148	Intra Company Ford Memo by Dr. Lick, Industrial Hygienist, "Evaluation of Asbestos Worker Exposure, Brake Research Unit, Scientific Building," February 20, 1970	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
149	NIOSH Cartoon Publication, 1972	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
150	Ford Memo by Mr. Toth, Supervisor Industrial Hygiene Section, dated August 3, 1973.	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
151	Maintenance Bulletin from Mr. Toth, Ford Plant Engineering Office Manufacturing Staff, August of 1973	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
152	Memo from Industrial Hygienist Charles Plaster to Mr. Keller, Supervisor of Personnel Services, re "Asbestos in Air Sampling - Research and Engineering Center," August 20, 1973	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
153	Memo from Norman Brusk, Ford Industrial Hygienist, to Mr. R.D. Byrom, Division Safety Engineer, November 8, 1973	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
154	Manual entitled, "Drum and Disc Brakes," June of 1974	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No

155	Ford Memo from J.R. Krauss, "Controlling Asbestos Exposure."	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
156	Ford Memo from Paul J. Ryder to Mr. E.W. Preston, July 16, 1974.	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
157	Ford Memo from Mr. Toth, Supervisor Industrial Hygiene Section, to Mr. Cole, Chemistry Department, Scientific Research Staff, April 23, 1975.	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
158	Three Memos, attached as Exhibit 13, to 2/13/18 Deposition of Ford in the Brown matter, July 15, 1975.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
162	Ford Technical Service Bulletin No. 99, October 24, 1975.	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
163	Letter/Memo from Liberty Mutual to Ford Dealer Development Dealership Presidents, December 29, 1975.	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
164	Brake lining dust removal survey	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
165	Memo dated June 4, 1975, Bates Nos. FAFD0017096 to 17097	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
166	Memo from R.E. Donly dated July 8, 1976, Bates Nos. FAFD0002864 to 2869	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
167	Memo from D.P. Cratty dated May 10, 1977	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
168	Inter-office memo. To: R.M. McCaffery, Manager Fairfax Transmission Plant. From Keith Lee, Industrial Hygienist. Subject:	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No

169	Inter-office memo. To: C. Roth, Manager , Kentucky Truck Plant. From: James M. Sproat, Industrial Hygienist. Subject: An Industrial	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
170	Memo dated January 30, 1980, Bates Nos. FAFD 0017190 to 17192	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
171	Plant Engineering Letter, Letter No. 80-1, March 17, 1980, Bates Nos. FAFD0008369 to 8373	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
172	Subcommittee Carcinogens in the Workplace Task Force Report	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
173	Script for a Slide Presentation Titled "Working with Asbestos"	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
174	Ford Memorandum from H.B. Lick, dated 9/20/83	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
175	Technical Service Bulletin, Bulletin Number 83-22, November 1, 1983	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
176	Typewritten document, Asbestos Removal from Product Materials	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
177	Memo from Roger L., Wabeke dated February 20, 1987	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
178	Industrial Relations Bulletin dated 10/14/86	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
179	Industrial Relations Bulletin dated 10/14/86	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No

181	Manufacturing Guideline No. G3-19 dated June 1988	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
182	Ford training manual	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
183	General brakes theory and operation, self-study student reference book	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
184	Manufacturing Guideline, No. G3-19 dated February 1995	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
185	Advanced Brake Systems Diagnosis and Services, Student Guide	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
186	Ford Electronic Field Communication	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
187	S/P2 Safety and Pollution Prevention, press release dated February 8, 2005	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
188	S/P2 Safety and Pollution Prevention, press release dated March 14, 2005	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
189	S/P2 Mechanical Pollution Prevention Asbestos	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
190	LLP, to Weitz & Luxenberg, P.C., Jerry Kristal, dated January 15, 2014	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
191	Asbestos - Automotive Brake and Clutch Repair Work, Safety and Health Information Bulletin	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No

192	EPA, Current Best Practices for Preventing Asbestos Exposure Among Brake and Clutch Repair Workers	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
193	American Journal of Industrial Medicine 45:229-237 (2004), Asbestos in Brakes: Exposure and Risk of Disease	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
194	Ford Motor Company, Privilege Log re CCAR/SP2	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
195	Decision and Order, Re: Cepeda vs. AC&S and Bisman vs. AC&S	BWMT: No DCo: No Ford: No UPRC: Yes Viad: No
196	Ford Motor Company, Electronic Field Communication dated 06/13/2007	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
197	Mudd, LLC vs. Ford Motor Company, et al., Ford Motor Company's First Supplemental Responses to Plaintiffs' Supplemental Request	BWMT: No DCo: No Ford: Yes UPRC: Yes Viad: No
198	Document with chart	BWMT: No DCo: No Ford: Yes UPRC: No Viad: No
201-299	Reserved	
300-399	Other Reserved Documents	

Defendants' Exhibits

BorgWarner Morse TEC, LLC

A-1	Plaintiff's original Complaint, including all documents attached thereto, and any Amended Complaint(s) filed herein.
A-2	Plaintiff's Responses to Borg Warner's Interrogatories, Request for Admissions, and Request for Production of Documents, and any documents or items referenced therein.
A-3	Plaintiff's Responses to any Defendant's Interrogatories, Requests for Production of Documents, Requests for Admissions, and any documents or items referenced therein.

A-4	Responses to Plaintiff's Interrogatories, Requests for Production, and Requests for Admission filed by Borg-Warner in this action, and any documents or items referenced therein.
A-5	Responses to Plaintiff's Interrogatories, Requests for Production, and Requests for Admission filed by any Defendant to this action.
A-6	Plaintiff's disclosures of Expert and Lay Witnesses and Identification of Exhibits for use at Trial, including any and all exhibits referenced herein.
A-7	Plaintiff's income tax records and returns.
A-8	Plaintiff's Social Security printout of earnings and other Social Security Records.
A-9	Plaintiff's personnel, employment, and retirement records and pay and earnings records related to all employers.
A-17	Any and all pathology materials regarding the Plaintiff.
A-20	OSHA standards for asbestos in 1972.
A-21	OSHA standards for asbestos in 1976.
A-22	OSHA standards for asbestos in 1986.
A-52	Deposition transcripts of any expert witness of any current or prior party in this case, including all such depositions taken in this case or any prior case involving said expert witness.

DCo, LLC

A-201	11	Toman to Victor (5/5/55)
A-202	12	Toman to Finke (6/21/55)
A-203	17	Handwritten Letter (11/5/57)
A-204	18	Toman to North (11/7/57)
A-208	24	Toman to North (10/23/60)
A-209	25	North to Toman (10/25/60)
A-210	26	Toman to Stovicek (11/30/60)
A-213	46	Roberson to All Employees (5/8/72)
A-214	48	Memo to Leeder: Dust Control (2/1/73)
A-215	51	Labrocque to Hickey (5/6/75)
A-216	54	Hayden to Lumet RE: Asbestos Survey (7/15/76)
A-217	56	McGranahan to Estkowsik RE: OSHA (7/30/76)
A-218	57	McGranahan to Various RE: OSHA limits (1/3/77)
A-219	58	Winchester to many: RE: Respirators (1/5/77)
A-220	59	OSHA compliance (02/8-11/77)
A-221	60	Wilson to Tankersley (Mar. 1977)
A-222	61	Harris to Meyer RE: OSHA PFT testing (8/4/77)
A-224	63	North to suppliers (7/25/78)
A-225	66	Hayden to North RE: OSHA hazard disclosure (8/16/78)

1	A-227	68	Ulfig to Berggren RE: John Deere response (10/3/78)
2	A-228	69	Naval Regional Center Study (1978)
3	A-229	70	Buescher to Managers RE: JM gasket ad (3/27/79)
4	A-230	71	Butler to Field RE: OSHA TWA (5/6/80)
5	A-231	72	Dana News Release (6/12/80)
6	A-232	73	Ulrich to Engineering (6/13/80)
7	A-234	76	Austin to Zeitz (1/23/81)
8	A-235	77	Feldmann to Victor (5/6/81)
9	A-236	78	Ulrich to Shapiro, response to military specs. (6/23/81)
10	A-237	79	Reichert to Intern'l Harvester (10/1/81)
11	A-238	80	Lehmann to Detroit Diesel (10/21/81)
12	A-240	83	Substitution Progress Memo (11/16/82)
13	A-241	84	Staab to Damusis (7/8/83)
14	A-242	86	Forde to Pigg (8/29/84)
15	A-243	87	Minutes Non-Asbestos Committee (10/29/84)
16	A-244	88	Feldmann to Buescher (12/12/84)
17	A-245	89	Holubek to Non-Asbestos Committee Members (1/8/85)
18	A-246	91	Feldmann to Bailey & Oliver (8/23/85)
19	A-247	94	USEPA hearing transcript (7/22/86)
20	A-248	95	Written Submission to EPA (1986)
21	A-249	97	Asbestos Free Guidelines (2/16/88)
22	A-250	98	MED-TOX Gasket Study (7/18/88)
	A-251	99	Defense Industrial Supply Center Survey (9/7/90)
	A-263	124B	36 Fed. Reg. 23207(1971)
	A-264	124D	37 Fed. Reg. 11318 (1972)
	A-265	124G	51 Fed. Reg. 22612 (1986)
	A-267	124M	59 Fed. Reg. 40964 (1994)
	A-277	579	Correspondence to Eiler from Reichert regarding non-asbestos alternative (2/4/86)

Ford Motor Company

A-560	FORD GEN-60	Puntoni, et al. "A Historical Cohort Mortality Study Among Shipyard Workers in Genoa, Italy," American Journal of Industrial Medicine (2001)
A-561	FORD GEN-61	Sheers, et al. "Mesothelioma Risks in a Naval Dockyard," Archives of Environmental

A-562	FORD SUPP-1	Plaintiffs' Answers to Style Interrogatories, dated May 16, 2017
A-579	FORD SUPP-18	Plaintiffs' Complaint
A-580	FORD SUPP-19	Plaintiffs' First Amended Complaint
A-581	FORD SUPP-20	Plaintiffs' Second Amended Complaint

Union Pacific Railroad Company

A-601	2000	Decedent's Medical Records from All Hospitals, Facilities, and Treating Physicians
A-602	2001	Decedent's Medical Records from Franciscan Health (Harrison)
A-603	2002	Decedent's Medical Records from Olympic Internal Medicine
A-604	2003	Decedent's Medical Records from Peninsula Cancer Center
A-605	2004	Decedent's Medical Records from Sound Oxygen
A-606	2005	Decedent's Medical Records from Harrison Health Partners Pulmonary and Sleep Medicine Bremerton
A-607	2006	Decedent's Medical Records from Harrison Health Partners Hematology and Oncology
A-646	2045	Decedent's Responses to Standard Asbestos Interrogatories
A-649	2048	Decedent's Responses to All Defendants' Written Discovery
A-650	2049	Exhibit 1 to Decedent Patrick Jack's Discovery Deposition Transcript –Handwritten List of Defendants
A-671	2070	Exhibit 30 to Decedent Patrick Jack's Discovery Deposition Transcript-Kitsap Internal Medicine Association
A-672	2071	Exhibit 31 to Decedent Patrick Jack's Discovery Deposition Transcript-Itemized Statement of Earnings

(c) Authenticity and admissibility disputed:

Plaintiffs' Exhibits

4	Ed Jack Cartoon re: Standard R.R. Procedure from Union Pacific Railroad retirement
22	Materials of Carl A. Brodtkin, M.D.
23	Materials of Arnold Brody, Ph.D.
24	Materials of Barry Castleman, ScD
25	Materials of Sean Fitzgerald.
26	Materials of Ronald Gordon, Ph.D.
27	Materials of Captain William Lowell.
28	Chief Inspector of Factories, "Annual Report of the Chief Inspector of Factories and Workshops for the Year"

1	29	OSHA Asbestos Regulations
2	30	OSHA Asbestos Regulations
3	31	OSHA Asbestos Regulations
4	32	OSHA Asbestos Regulations
5	33	NIOSH Revised Recommended Asbestos Standard, December 1976.
6	34	EPA website, "Protect Your Family from Asbestos-Containing Vermiculite Insulation": https://www.epa.gov/asbestos/protect-your- family-asbestos-
7		contaminated-vermiculite-insulation
8	35	National Cancer Institute website, "Asbestos Exposure and Cancer Risk": https://www.cancer.gov/about-cancer/causes-
9	36	American Cancer Society website, "Asbestos and Cancer Risk": https://www.cancer.org/cancer/cancer-causes/asbestos.html
10	37	"Asbestos," US Dept of Labor, OSHA website: https://www.osha.gov/SLTC/asbestos
11	48	Video: "Don't Blow It!" Presented by the U.S. EPA and ALA of Maryland. Produced September 1986. (also FD 6039)
12	49	OSHA "The Proposed Standard for the Automotive Brake and Clutch Service Industry," Federal Register, Vol. 55, No. 140, July 20, 1990.
13	50	Teschke et al, "Mesothelioma Surveillance to Locate Sources of Exposure to Asbestos", Canadian Journal of Public Health, p. 163 (1997).
14	55	VIDEO: MAS Work Practice Study, "Hand Sanding of Brake Shoes." Date: March 2001.
15	56	"Malignant Mesothelioma in Australia, 1945-2000," by James Leigh. Am. J. of Ind. Med. 41:188-201 (2002).
16	59	S/P2 online course: "Mechanical Pollution Prevention Asbestos," June 19, 2006.
17	60	"Asbestos Exposure Causes Mesothelioma, But Not This Asbestos Exposure: An Amicus Brief to the Michigan Supreme Court," by Laura S. Welch, MD; Int. J. Occup. Environ. Health, Vol. 13/ No. 3. July/September 2007
18	69	What Will Replace Asbestos Gaskets John e. Zeitz – July 1980
19	70	Letter-Neil, Armstrong to North, Victor Products; April 1, 1982 (Subject-Asbestos Content Label)
20	159	Minutes of NIOSH Meeting, July 21, 1975.
21	160	1975 Automotive Service Industry Association Management News Bulletin, "Asbestos Health Hazards."
22	161	NIOSH "Current Intelligence Bulletin 5, August 8, 1975: Asbestos: Asbestos Exposure During Servicing of Motor Vehicle Brake and Clutch Assemblies."
23	180	Thumb drive
24	199	Exhibits to the Deposition of Union Pacific taken in the matter of Jack v. Asbestos Corporation, Ltd., dated September 6, 2018.
25	200	Hueper WC. Industrial management and occupational cancer.
26		

Defendants' Exhibits**Borgwarner Morse Tec LLC**

Plaintiffs requested copies of Borg Warner's exhibits on August 29, 2018. But Plaintiffs did not receive copies of Borg Warner's exhibits until the day this filing was due, September 10, 2018. Therefore, Plaintiffs are unable to fully evaluate the admissibility of Borg Warner's exhibits without first having an opportunity to examine them.

A-10	Plaintiff's union records.
A-11	Records pertaining to Plaintiff's unemployment compensation, if any.
A-12	Plaintiff's worker compensation records, if any.
A-13	Business records of Plaintiff's employers, if any, including but not limited to personnel files, safety records, purchase records, invoices, work orders, plans, blueprints and specifications.
A-14	Any and all military records of Plaintiff
A-15	Records pertaining to any application and claim filed by Plaintiff for any disability compensation.
A-16	Any and all x-rays, CT scans, or other radiographic films or other radiologic material of the Plaintiff and or relevant to Plaintiffs' claims.
A-18	All medical records of Plaintiff
A-19	Transcripts (including enlargements thereof) of any and all depositions taken of any witness in this action or to be taken in this action and/or in any prior action referenced or used therein, and/or of any witness identified in Defendant's Witness List(s) filed in this action.
A-23	OSHA standards for asbestos from 1994 through the present.
A-24	Written reports of any expert witness designated by any party to this litigation and any and all references cited therein or attached thereto.
A-25	Models, charts, diagrams, photographs and/or demonstrative materials relied upon by any expert witness which may include slides/diagrams/pictures of chrysotile fibers, slides/diagrams/pictures of amphibole fibers, slides/diagrams/pictures of lungs and/or the respiratory system; videotape of rotating disc and applying pressure at variable speeds; Videotape of study showing the temperature of the rubbing surfaces, part of the thermoelastic stability analysis.
A-26	Demonstrative aids showing clutch and/or brake materials and products.
A-27	Demonstrative aids illustrating products manufactured, sold, or distributed by Borg-Warner.

1	A-28	Borg-Warner product brochures, catalogs, and documents relating to its alternate friction materials program.
2	A-29	To the extent not otherwise identified herein, all applicable governmental regulations regarding the use of asbestos and/or asbestos-containing products, including but not limited to, those promulgated by the National Institute for Occupational Safety and Health (NIOSH), the Occupational Safety and Health Administration (OSHA), The Environmental Protection Agency (EPA), the Code of Federal Regulations, the Federal Register, and the American Conference of Governmental Industrial Hygienists (ACGIH)
3	A-30	Any and all pleadings including Answers, and any and all filings, discovery responses, motions, exhibits to any motions filed and/or served by any other party to this action, regardless of whether such a party is still a party at the trial of this case.
4	A-31	Any and all expert reports prepared or submitted by any party to this case whether such a party is still a party at trial in this case and all citations and exhibits therein or attached thereto, or referenced thereby, and all other items referenced or cited therein or attached thereto.
5	A-32	Any and all expert reports prepared or submitted by any party to this case whether such a party is still a party at trial in this case and all citations and exhibits therein or attached thereto, or referenced thereby, and all other items referenced or cited therein or attached thereto.
6	A-33	Maps, drawings, site drawings/blueprints, schematics, specifications, annual reports, intra-company communications, newspaper articles, and/or photographs, of any jobsite or facility where Plaintiff lived or was employed, including, but not limited to those items attached to any motions filed by Plaintiffs, Defendant, or any other current or prior Defendant, whether in full or excerpted.
7	A-34	Copies of warning labels on any defendants' products whether or not such defendant appears at the time of trial.
8	A-35	Photographs of the products of any defendants or other non-party, including bankrupt defendants, to this litigation.
9	A-36	Photographs of any asbestos product literature or packaging material, or exemplars of same.
10	A-37	All catalogs, product literature, advertisements, packaging materials, etc. of any entities identified by any party to this litigation or any entity identified in discovery or deposition in this litigation.
11	A-38	Records from plaintiff's residential sites, including purchase records, abatement records, and invoices for products used or services or work done at said sites.
12	A-39	Any and all literature, treatises, books, articles, and case studies reviewed, referenced, relied upon or written by any current or prior party's expert witness.
13	A-40	Photographs of transmission components.
14	A-41	Clutch and clutch assembly/exemplar/drawings/photos.
15	A-42	Photograph(s) of Borg-Warner packaging.
16	A-43	Videotape of rotating disc and applying pressure at variable speeds.

1	A-44	Videotape of study showing the temperature of the rubbing surfaces, part of the thermoelastic stability analysis.
2	A-45	Photographs; sample of a set used at different subbing speeds, 20 feet a second, sample of friction material rubbing against the quartz disc, asbestos crude burning, piece of chrysotile.
3		
4	A-46	Guide to Specifications and Standards of the Federal Government, General Services Administration, Washington, D.C., 1965.
5	A-47	Any and all documents from Plaintiff's employers and/or from any worksites where Plaintiff worked.
6	A-48	Disclosures of Expert and Lay Witnesses and Identification of Exhibits for use at Trial of any party, including any current or prior Defendants, including any and all exhibits referenced herein
7		
8	A-49	Records of any other lawsuits or claims filed by Plaintiff.
9	A-50	Any and all records, documents or other items of Defendant Borg-Warner regarding the design, production, marketing, use, repair, replacement, maintenance, sales and distribution of Borg-Warner products, including, but not limited to any and all records, memoranda, reports, letters, books, journals, periodicals, pamphlets, circulars, advertisements, studies, instructions, working papers, drafts, minutes, graphs, prints, notes, messages, catalogues, microfilms, microfiche, bulletins, design drawings, correspondence, pleadings, interrogatories, transcripts, orders, opinions, contracts, disclosure statements, invoices, credit records, receipts, checks, photographs, videotapes, films, negatives, movies, mechanical and/or electrical recordings, reproductions of e-mail communications and contents of original e-mail communications, books, drawings, facsimiles, sketches, intra-company communications, blue-prints, instructions, specifications, objects, tangible items, and any and all other writings, typings, printings, or copies of reproductions thereof, regardless of format.
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16	A-51	Invoices, purchase records, abatement records, and all other records, files, and documents from Plaintiff's employers or premises owners where Plaintiff or Plaintiff's parents, siblings, or other relatives worked, regarding any asbestos-containing products at the worksites.
17		
18	A-53	Any and all accident/health/life/disability records relating to Plaintiffs.
19	A-54	Any and all settlement agreements and/or Orders of Dismissal of Defendants that have either settled with Plaintiffs or who have been dismissed.
20	A-55	Declarations, depositions or affidavits of Plaintiffs or any Plaintiffs' fact witness, and any all exhibits attached thereto.
21	A-56	Declarations, depositions, or affidavits of any other current or prior Defendant, and any and all exhibits attached thereto.
22	A-57	Any and all exhibits identified by the Decedent.
23	A-58	Any and all exhibits identified by other current or prior Defendants, subject to objection.
24	A-59	Documents and records produced, or to be produced for any of plaintiff's past or present employers and for any worksite at which Plaintiff may have worked, and records of or for any companies identified therein.
25		
26	A-60	NCI Fact Sheet February 1, 2007 (Honeywell 89)

1	A-61	NCI Fact Sheet May 1, 2009 (Honeywell 90)
2	A-62	ATSDR - March 17, 2003, Report on the Expert Panel on Health Effects of Asbestos and Synthetic Vitreous Fibers: The Influence of Fiber Length (Honeywell 91)
3	A-63	ATSDR - April 1, 2008, Asbestos - Health Effects (Honeywell 92)
4	A-64	Castleman Memo to Selikoff, November 5, 1979 (Honeywell 93)
5	A-65	Castleman Letter to Robert Ballard, February 16, 1985 (Honeywell 94)
6	A-66	Castleman 1st (First) Edition Dust Jacket Covers - Asbestos Medical and Legal Aspects; Castleman Book Excerpt Page xxi (Honeywell 95)
7	A-67	OSHA EPA Letter to Patty Murray Letter (February 10, 2004) (Honeywell 105)
8	A-68	Letter from Irving Selikoff to Barry Castleman dated July 11, 1973 (Honeywell 127)
9	A-69	Letter from Irving Selikoff to Barry Castleman dated December 27, 1972 (Honeywell 128)
10	A-70	Letter from Barry Castleman to VanDiver Brown, July 10, 1981 (Honeywell 129)
11	A-71	Jane's Fighting Ships 1962-63, page 343, John C. Butler Class, Rated as Escort Ships (DE); page 369, Albatross Class Mine Sweeper (Honeywell 160)
12	A-72	General Specifications for Machinery – Subsection S39-1, Navy Department, Bureau of Engineering, dated 3 Feb 1939 (Honeywell 162)
13	A-73	United States Navy Department, Bureau of Engineering, Instructions Relative to Heat Insulation, Reprint of Chapter 13 of the Manual of Engineering Instructions (Revised December 1933; Reprinted May 1939) (Honeywell 163)
14	A-74	Bureau of Ships Manual, Chapter 39, Thermal Insulation, NAVSHIPS 250- 000(39), dated 24 August 1945 (Honeywell 164)
15	A-75	Bureau of Ships Manual, Chapter 39, Thermal Insulation, NAVSHIPS 250- 000(39), dated 24 August 1945 (Honeywell 165)
16	A-76	Navy Department Specification, <i>Felt, Insulating, Asbestos, 32F3a</i> , dated 15 October 1945 (Honeywell 166)
17	A-77	u of Medicine (BUMED) memorandum from Code 55 to Code 00 (Chief Bureau of Medicine and Surgery), entitled "Occupational Health Issues for POM-80, 9 June 1977, from National Archives (Honeywell 167)
18	A-78	Deposition Transcripts of Monty Anderson (Vols. 1 & 2), taken on January 16 and January 19, 1987 in <i>Anderson et al. v. Fibreboard Corp. et al.</i> (Kitsap County Super. Ct. No. 85-2-00438-0) (Honeywell 173A)

1	A-79	Deposition Transcript of Earl Fowler, taken on May 23, 1994 in <i>Fowler v. Pittsburgh-Corning Co. et al.</i> (King County Super. Ct. No. 94-2-00458-1) (Honeywell 173B)
2		
3	A-80	Deposition Transcripts of Maurice Lane (Vols. 1 & 2), taken on October 17, 1990 in <i>In Re Asbestos Cases of Schroeter, Goldman & Bender v. Fibreboard Corp. et al.</i> (King County Super. Ct. No. 81-2-08703-5). (Honeywell 173C)
4		
5		
6	A-81	Deposition Transcript of Robert Raymond Leonard, taken on November 16, 1982 in <i>Kinsman v. Johns-Manville Corp. et al.</i> (W.D. Wa. No. C81-631T) (Honeywell 173D)
7		
8	A-82	Deposition Transcript of John Northey, taken on April 15, 1983 in <i>In Re Kitsap County Asbestos Cases of Schroeter, Goldmark and Bender</i> (Kitsap County Super. Ct. No. 91-2-00940-1) (Honeywell 173E)
9		
10	A-83	Deposition Transcript of James Stark, taken on July 21, 1988 in <i>Stark v. Abex Corp., et al.</i> (Kitsap County Super. Ct. No. 86-2-00401-9) (Honeywell 173F)
11		
12	A-84	Deposition Transcripts of Larry Stimmel (Vols 1 & 2), taken on June 8 and July 7, 2016 in <i>Page v. Air & Liquid Sys. Corp. et al.</i> (W.D. Wa. No. 2-14-cv-01853) (Honeywell 173G)
13		
14	A-85	Deposition Transcripts of Hugh Tefft (Vols. 1 & 2), taken on January 3 and 4, 1984 in <i>Tefft et al. v. AC&S, Inc., et al.</i> (W.D. Wa. No. C80-924M) (Honeywell 173H)
15		
16	A-86	Deposition Transcript of Richard Walmach, taken on October 18, 2005 in <i>Walmach v. Aqua-Chem., Inc. et al.</i> (L.A. County Super. Ct. No. BC 336 186) (Honeywell 173I)
17		
18	A-87	Deposition Transcripts of Melvin Wortman (Vols. 1-3), taken on April 3, 10, and 16, 2009 in <i>Nelson v. Buffalo Pumps, Inc., et al.</i> (King County Super. Ct. No. 08-2-17324-1) (Honeywell 173J)
19		
20	A-88	Deposition Transcript of Melvin Wortman, taken on November 3, 2008 in <i>Anderson v. Armstrong Int'l, Inc. et al.</i> (King County Super. Ct. No. 07-2-40128-8) (Honeywell 173K)
21		
22		
23	A-89	Deposition Transcript of Roy Yager, taken on March 19, 2004 in <i>Yager v. A.W. Chesterton Inc., et al.</i> (Madison County, Ill. Cir. Ct. No. 03-L-1353) (Honeywell 173L)
24		
25	A-90	Honeywell's Discovery Requests to Plaintiffs, and Plaintiffs' Responses thereto (Honeywell 174)
26	A-91 to A-200	Reserved.

DCCo, LLC

A-205	20	Virchow to Bleiler (6/9/58)
A-206		Victor Safety Program 9/13/1958
A-207	22	Virchow to Bleiler RE: Dust levels (1958)
A-211	42	Military Request for Quotation (9/24/70)
A-212	44	Balcar to Budovec RE: OSHA (7/26/71)
A-223	62	Memo re: Asbestos Packing and Gaskets by G.R. Jones (3/16/78)
A-226		Memo re: Use of Respirators by Herlein 9/12/1978
A-233	75	Manville gasket study (1980)
A-239	82	Zeitz to Nelson RE: Forwarding Gasket studies (1/15/82)
A-252	102	Braun Intertec Corporation, <i>Results of Asbestos Air Sampling — Head and Manifold Gasket Removal, Minnesota Power Center, Brooklyn Park, Minnesota</i> (1994).
A-253	103	Clayton Environmental Consultants, <i>Results of Asbestos Air Sampling—Lift Truck Engine Assembly, Minnesota Power Center, Brooklyn Park, Minnesota</i> (1994)
A-254	105	John Spencer, <i>Evaluation of the Actual Contribution of Airborne Asbestos Fibers from the Removal and Installation of Gaskets and Packing Material</i> (Environmental Profiles, Inc. 1998).
A-255	106	Richard Hatfield Trial Testimony from the <i>Gerald Henderson</i> case in South Carolina (10/8/01)
A-256	107	William Longo Trial Testimony from the <i>Verda Sutton</i> case in Hardin County, TX (6/6/02)
A-257	109	William Longo Deposition Testimony from the <i>Lewis Forbes</i> case in San Francisco, CA (2/13/03)
A-258	110	John Spencer, <i>Asbestos Exposure Assessment During the Removal of Engine Gasket Materials</i> (Environmental Profiles, Inc. 2003). Including videos and pictures
A-259	111	Frederick W. Boelter and John W. Spencer, <i>Caterpillar Equipment Study: An Evaluation of Airborne Asbestos Exposure During Maintenance and Repair of Caterpillar Equipment</i> (Boelter & Yates, Inc. and Environmental Profiles, Inc. 2003). Including videos and pictures
A-260	112	Frederick W. Boelter, <i>Exposure Assessment Engine Gaskets Removal and Replacement 1963/1964 Chevrolet Impala</i> (Boelter & Yates, Inc. 2004).
A-261		Washington State Government Occupational Health Codes (as applicable)
A-262	124A	36 Fed. Reg. 10466 (1971)

1	A-266	124K	58 Fed. Reg. 58964 (1993)
2	A-268		Photographic reproductions, models/exemplars, diagrams, and other printed materials depicting the vessels identified by Plaintiffs.
3	A-269	138	SD-20: The DOD Qualification Program.
4	A-270	149	Letter from Bigley to Hughes (2/8/79)
5	A-271	150	Assessment of Asbestos Concentration on Maritime Vessels: Maintenance and Repair (Feb-81)
6	A-272	154	Assessment of Asbestos Concentrations in the Engine Room Environment of Marine Vessels (Jan-79)
7	A-273	155	Assessment of Asbestos Concentrations in the James River Reserve Fleet (Oct-82)
8	A-274	217	Military QPL for gaskets (Various)
9	A-275	568	Correspondence from John E. Zeitz to Larry Dorsey of the EPA regarding additional information on asbestos-free gasket materials availability and performance characteristics (October 21, 1981).
10	A-276	570	Correspondence from James Ulrich to Joseph Falco regarding John Zeitz publications on non-asbestos-containing gasket materials (October 27, 1982).
11	A-278	580	Affidavit of Dr. William Longo regarding industrial and automotive gaskets (2/16/17)
12	A-279	584	Demonstrative Exhibits – physicals gaskets, photos of gaskets, Clarence Spicer, asbestos.
13	A-390	585	Catalog: McCord Gaskets (Undated)
14	A-281	586	Catalog: McCord Gaskets tractor and industrial (Series C) (1941)
15	A-282	587	Catalog: McCord Gaskets (100) passenger cars, trucks, buses, tractors, industrial engines, combines, threshers, graders, marine, air cooled engines, light plants and misc (1965)
16	A-283	588	Catalog: McCord Gaskets (919) imported (1966-04)
17	A-284	589	Catalog: McCord Gaskets Automatic Transmission (929) (1966-07)
18	A-285	590	Catalog: McCord Gaskets Quick Reference (935) (1966-09)
19	A-286	591	Catalog: McCord Gaskets US Tractor List (TR-26) (1966-11)
20	A-287	592	Catalog: McCord Gaskets Quick Reference (968) (1967-04)
21	A-288	593	Catalog: McCord Gaskets Numerical Identification List (276) (1969-02)
22	A-289	594	Catalog: McCord Gaskets US Tractor List (TR-29) (1969-06)
23	A-290	595	Catalog: McCord Gaskets Numerical Identification List (1-60-1) (1970-10)

A-291	596	Catalog: McCord Gaskets Numerical Identification List (1-60) (1971-06)
A-292	597	Catalog: McCord Automotive replacement products (1-57) (1975-06)
A-293	598	Catalog: McCord Gaskets (1-102) truck, bus, farm equipment and industrial, off highway equipment and marine (1976-01)
A-294	599	Catalog: McCord Gaskets (1-100) passenger cars and light trucks (1977-01)
A-295	600	Catalog: McCord Gaskets (1-556) water outlet (1977-04)
A-296	601	Catalog: McCord Gaskets Truck. Bus, Farm Equipment, Industrial, Off Highway Equipment and Marine (1-102-1) (1979-04)
A-297	602	Catalog: McCord Gaskets (Guide A-2) prior to 1937
A-298	603	Catalog: McCord Gaskets (Guide C-2) 1952 tractor and industrial
A-299	604	Catalog: McCord Gaskets (Guide B-3) 1937 – 1960 passenger cars, trucks, busses, marine, air cooled engines and misc
A-300	605	Catalog: FelPro Gasket (460-71) – foreign cars (1972-02)
A-301	606	Catalog: FelPro Master Gaskets (900) – passenger (undated)
A-302	607	Catalog: FelPro Master Gaskets (900-71) – passenger (undated)
A-303	608	Catalog: FelPro Master Gaskets (900-77) – passenger (1977)
A-304	609	Catalog: FelPro Interchange List (1466-77) (1977)
A-305	610	Catalog: FelPro Master Gaskets (900-84) – passenger supplement (1984)
A-306	611	Catalog: FelPro Master Gaskets (901) – trucks, buses, marine engines, industrial engines (50 th yr) (Undated)
A-307	621	Catalog: FelPro Master Gaskets (902) – tractor, farm equipment, off the road equipment, air cooled engines (Undated)
A-308	613	Catalog: FelPro Master Gaskets (901A) – truck and tractor supplement (1971)
A-309	614	Catalog: FelPro Master Gaskets (900-96) passenger (1996-01)
A-310	615	Catalog: Carquest Gaskets Interchange Guide (003B) (1993-01)
A-311	616	Catalog: Snap-On Fast Track Transmission Troubleshooter – user manual (1993-08)
A-312	617	Catalog: CR Industries Seals and Bearings (457205) passenger cars & light trucks (1986)

1	A-313	618	Catalog: CR Industries Seals and Bearings (457809) automotive/front and rear wheel drive models (1986-07)
2	A-314	619	Catalog: Precision Automotive Industries Seals and Bearings (1996-11)
3	A-315	620	Catalog: Precision Universal Joints and CV Products Master (MCUJ01) conventional and FWD cars; light, medium and heavy duty trucks (2001-01)
4	A-316	623	Final Technical Report of the Public Health Investigation to Assess Potential Exposures to Airborne and Settled Surface Dust in Residential Areas of Lower Manhattan. ATSDR 911 (2002).
5	A-317	624	Asbestos Fibers in the Ambient Air in the Greater San Francisco Area, Mangold (March 1983).
6	A-318		Plaintiffs' Complaint for Personal Injury [DKT #1] (4/6/17)
7	A-319		Plaintiffs' First Amended Complaint [DKT #190] (8/4/17)
8	A-320		Plaintiffs' Second Amended Complaint [DKT # 320-1] (4/18/18)
9	A-321		Plaintiffs' verified Responses to Style Interrogatories (5/18/17)
10	A-322		Supplemental Answers to Style Interrogatories 11 and 12 (<i>Unverified</i>) (6/9/17)
11	A-323		Second Supplemental Answers to Style Interrogatories 11, 12 and 13 (<i>Unverified</i>) (6/16/17)
12	A-324		Plaintiffs' Responses to DCo's Interrogatories and Requests for Production with Exhibits (<i>Unverified</i>) (6/25/18)
13	A-325		DCo's Verified Responses to Plaintiffs' First Set of Interrogatories and Requests for Production (4/9/18)
14	A-326		DCo's Verified Responses to Plaintiffs' Second Set of Interrogatories and Requests for Production (6/12/18)
15	A-327		Decedent's Social Security printout of earnings. (3/28/17)
16	A-328		Decedents' personnel and employment records from Puget Sound Naval Shipyard (4/18/17)
17	A-329		Decedents' National Personnel Military Records (9/12/17)
18	A-330		Decedents' Pathology Report from Harrison Medical Center (7/8/16)
19	A-331		Patrick Jack's Medical and Billing Records from Harrison HealthPartners Hematology & Oncology.
20	A-332		Patrick Jack's Medical and Billing Records from Harrison HealthPartners Pulmonary & Sleep Medicine
21	A-33		Patrick Jack's Medical and Billing Records from Harrison Memorial Hospital
22	A-334		Patrick Jack's Medical and Billing Records from Olympic Internal Medicine
23	A-335		Patrick Jack's Medical and Billing Records from Peninsula Cancer Center

1	A-336	Patrick Jack's Medical and Billing Records from InHealth Imaging – North Kitsap Medical Center
2	A-337	Death Certificate of plaintiffs' decedents (10/15/17).
3	A-338	Jack Property Site Visit Photos
4	A-339	Affidavit of Applicant for Marriage License for Patrick Jack and Leslie Moreau (7/26/16)
5	A-340	Deposition Testimony and Exhibits of Dominik D. Alexander, PhD, MSPH taken in <i>Leslie Jack, Individually and as Personal Representative of the Estate of Patrick Jack; David Jack, Individually v. Asbestos Corp., et al.</i> (6/8/18)
7	A-341	Curriculum Vitae of Dominik Alexander, PhD
8	A-342	Reliance Materials of Dominik Alexander, PhD
9	A-343	Expert Report of Dominik D. Alexander, PhD, MSPH (4/17/18)
10	A-344	Supplemental Expert Report of Dominik D. Alexander, PhD, MSPH (6/6/18)
11	A-345	Deposition Testimony and Exhibits of Clancy Cornwall taken in <i>Leslie Jack, Individually and as Personal Representative of the Estate of Patrick Jack; David Jack, Individually v. Asbestos Corp., et al.</i> (6/13/18)
12	A-346	Curriculum Vitae of Clancy Cornwall
13	A-347	Reliance Materials of Clancy Cornwall
14	A-348	Case Notes of Clancy Cornwall
15	A-349	Deposition Testimony and Exhibits of Mary Finn, PhD, MPH, CIH, CPH taken in <i>Leslie Jack, Individually and as Personal Representative of the Estate of Patrick Jack; David Jack, Individually v. Asbestos Corp., et al.</i> (6/15/18)
17	A-3450	Curriculum Vitae of Mary Finn, PhD, MPH, CIH, CPH
18	A-351	Reliance Materials of Mary Finn, PhD, MPH, CIH
19	A-352	Expert Report of Mary Finn, PhD, MPH, CIH, CPH (4/16/18)
20	A-353	Supplemental Report of Mary Finn, PhD, MPH, CIH, CPH. (5/17/18)
21	A-354	Deposition Testimony and Exhibits of David Weill, MD taken in <i>Leslie Jack, Individually and as Personal Representative of the Estate of Patrick Jack; David Jack, Individually v. Asbestos Corp., et al.</i> (6/18/18)
22	A-355	Curriculum Vitae of David Weill, MD
23	A-356	Reliance Materials of David Weill, MD
24	A-357	Expert Report of David Weill, MD (4/9/18)
25	A-358	Supplemental Expert Report of David Weill, MD (5/11/18)
26	A-359	Plaintiffs' Responses to Honeywell's Requests for Admission (Honeywell Ex. 174)
	A-360	Supplemental Report of Andrew Churg, MD
	A-361 to A-500	Reserved.

Ford Motor Company

A-501	FORD GEN-1	Ford Passenger Shop Manual dated November 24, 1950
A-502	FORD GEN-2	Hickish, DE and KL Knight. 1970. Exposure to Asbestos During Brake Maintenance. Ann Occup Hyg 13:17-21
A-503	FORD GEN-3	Letter from William Pierson to Dr. Irving Selikoff dated January 28, 1970 regarding brake lining material as a pollutant
A-504	FORD GEN-4	Letter from Jeremiah R. Lynch to William Pierson dated February 12, 1970 regarding electron microscope magnification
A-505	FORD GEN-5	Letter from W. R. Pierson to Dr. Jeremiah Lynch dated February 20, 1970 acknowledging letter of February 12, 1970
A-506	FORD GEN-6	Letter from Dr. Irving Selikoff to William Pierson dated February 26, 1970 regarding brake lining material in the ambient air
A-507	FORD GEN-7	Handwritten note dated October 20, 1970 of telephone call to Dr. Irving Selikoff inviting him to visit Ford
A-508	FORD GEN-8	Handwritten notes dated October 26, 1970 of telephone call to Dr. Irving Selikoff to set up visit to Ford
A-509	FORD GEN-9	Letter from Roy L. Gealer to Dr. Irving Selikoff dated November 6, 1970 transmitting copies of articles relating to brake linings
A-510	FORD GEN-10	Memo from R. L. Gealer to A.E. Anderson et al. dated November 13, 1970 regarding visit by Drs. Selikoff and Nicholson
A-511	FORD GEN-11	Letter from Dr. Irving Selikoff to R. L. Gealer dated November 16, 1970 acknowledging receipt of articles relating to brake linings
A-512	FORD GEN-12	Memo from J. S. Ninomiya to H. L. Misch dated November 16, 1970 regarding Asbestos Emissions from Brake Lining Wear
A-513	FORD GEN-13	Handwritten notes of visit of Dr. Irving Selikoff's November 23, 1970 visit to Ford
A-514	FORD GEN-14	Letter from Erwin Eichen to Dr. Irving Selikoff dated January 20, 1971 regarding December 1970 visit to Mt. Sinai

1	A-515	FORD GEN-15	Letter from Dr. Irving Selikoff to Roy Gealer dated May 13, 1971 regarding letter to Merrill-Palmer
2			
3	A-516	FORD GEN-16	Memo from R. L. Gealer to A. E. Anderson, et al. dated July 26, 1971 regarding visit by Bendix Research
4			
5	A-517	FORD GEN-17	Handwritten notes of August 24, 1971 meeting with Bendix Research
6			
7	A-518	FORD GEN-18	Handwritten notes dated August 24, 1971 regarding meeting with Bendix Research
8			
9	A-520	FORD GEN-20	Letter from Dr. Irving Selikoff to W. Dale Compton dated January 3, 1973 regarding review of asbestos toxicology work
10	A-521	FORD GEN-21	Letter from W. Dale Compton to Dr. Irving Selikoff dated January 20, 1973 appointing Dr. R. L. Gealer as Ford liaison
11			
12	A-522	FORD GEN-22	Letter from Dr. Irving Selikoff to W. Dale Compton dated February 2, 1973 acknowledging appointment of Dr. R. L. Gealer
13			
14	A-523	FORD GEN-23	Memo from H. B. Lick to J. A. Keller, et al. dated March 7, 1973 regarding asbestos in air sampling with attached data sheet/report regarding brake drum decomposition
15			
16			
17	A-524	FORD GEN-24	Handwritten note dated March 16, 1973 regarding telephone conversation with Dr. Irving Selikoff
18			
19	A-525	FORD GEN-25	Handwritten note dated March 27, 1973 regarding visit with Arthur Langer, Mount Sinai School of Medicine
20			
21	A-526	FORD GEN-26	Memo from R. L. Gealer to J. Harwood dated April 10, 1973 regarding Visit to Mount Sinai School of Medicine regarding Ford Grant for Asbestos Toxicology Research
22			
23	A-527	FORD GEN-27	Letter from R. L. Gealer to Dr. Arthur Langer dated April 10, 1973 transmitting brake drum dust sample
24			
25	A-528	FORD GEN-28	Anderson, et al., "Asbestos Emissions From Brake Dynamometer Tests" dated June 4, 1973.(SAE Report and Reprint Versions) Report No. SR-73-64
26			

1	A-529	FORD	Memo from Charles Plasters to J. A. Keller dated August 20,
2		GEN-29	1973 regarding asbestos in air sampling
3	A-530	FORD	Letter from W. Dale Compton to Dr. Irving Selikoff dated
4		GEN-30	October 23, 1973 regarding grant renewal
5	A-531	FORD	Memo dated November 8, 1973 from Norman Brusk to R. D.
6		GEN-31	Byron regarding Evaluation of Asbestos Exposure –
7			Receiving Inspection Area – Sterling Axle Plant
8	A-532	FORD	Letter from Dr. Duane Block to Dr. Irving Selikoff dated
9		GEN-32	January 11, 1974 offering assistance with research project
10	A-533	FORD	Memo from R. L. Gealer and A. E. Anderson to W. D.
11		GEN-33	Compton dated March 8, 1974 regarding Brake Maintenance
12			Shop Workers Dust Exposure – Mount Sinai School of
13			Medicine Investigation
14	A-534	FORD	Letter from Dr. Arthur Langer to Dr. Roy Gealer dated April
15		GEN-34	8, 1974 enclosing summary of research
16	A-535	FORD	Memo from R. L. Gealer to J. J. Harwood dated April 19,
17		GEN-35	1974 regarding SRS Research Grant – Mount Sinai School
18			of Medicine
19	A-536	FORD	Handwritten note dated September 16, 1974 regarding
20		GEN-36	conversation with Dr. Irving Selikoff
21	A-537	FORD	Letter from W. Dale Compton to Prof. Irving Selikoff dated
22		GEN-37	September 17, 1974 regarding grant renewal
23	A-538	FORD	Letter from Roy Gealer to Prof. Irving Selikoff dated
24		GEN-38	October 8, 1974 forwarding grant renewal check
25	A-539	FORD	Letter from Prof. Irving Selikoff to Roy Gealer dated
26		GEN-39	October 14, 1974 acknowledging receipt of grant check
	A-540	FORD	Memo from Roy L. Gealer to T. Cole dated April 14, 1975
		GEN-40	regarding Exposure of Brake Maintenance Shop Workers to
			Brake Dust

1	A-541	FORD	Memo from R. L. Gealer to D. R. Coulson dated June 12,
2		GEN-41	1975 regarding SRS Research Grant – Mount Sinai School
3			of Medicine
4	A-542	FORD	Minutes of Occupational Exposures to Asbestos Dust From
5		GEN-42	Brake Meeting (NIOSH) dated July 21, 1975
6	A-543	FORD	NIOSH "Dear Colleague" letter dated August 8, 1975
7		GEN-43	including recommended procedures for asbestos brake and
8			clutch servicing
9	A-544	FORD	Automotive Service Industry Association Management News
10		GEN-44	Bulletin dated September 1975 regarding Asbestos Health
11			Hazards
12	A-545	FORD	Technical Service Bulletin No. 99 dated October 24, 1975
13		GEN-45	(Article No. 1269 – Brake Asbestos Fiber Dust Removal)
14	A-546	FORD	Technical Service Bulletin Number 104 dated January 23,
15		GEN-46	1976 regarding Brake Asbestos Fiber Dust Removal
16	A-547	FORD	Minutes of March 19, 1976 NIOSH meeting
17		GEN-47	
18	A-548	FORD	Automotive Parts & Accessories Association, Inc. Bulletin
19		GEN-48	Number 9 dated March 19, 1976 regarding Service Industry
20			Alerted to Asbestos Hazard
21	A-549	FORD	Letter from Dr. Arthur Rohl to Dr. Erwin Eichen dated
22		GEN-49	March 23, 1976 enclosing manuscript of Asbestos Exposure
23			During Brake Lining Maintenance and Repair
24	A-550	FORD	Automotive Service Councils, Inc. Special Bulletin dated
25		GEN-50	April 22, 1976 regarding Asbestos Dust Health Hazards –
26			Motor Vehicle Brake and Clutch Servicing
	A-551	FORD	Know and Understand the Law – OSHA will soon be
		GEN-51	around. May 1976. Brake and Front End. Vol. 46, No. 5.
			Babcox Publications, Inc

1	A-553	FORD	Package Material Specifications. Revisions to L-1517 dated
2		GEN-53	August 21, 1980
3	A-554	FORD	Memo from M. O'Brien to H.R. Clemett dated January 7,
4		GEN-54	1981 regarding Industrial Hygiene Survey at Arizona
5			Proving Ground
6	A-555	FORD	Package Material Specifications. Revisions to L-1516,
7		GEN-55	April 29, 1987
8	A-556	FORD	Package Material Specifications. Revisions to L-1517, dated
9		GEN-56	August 22, 1989
10	A-557	FORD	Picture of Ford Box label L-1516
11		GEN-57	
12	A-558	FORD	Picture of Ford Box label L-1516
13		GEN-58	
14	A-559	FORD	Ford Dynanometer Testing Video, Ford Motor Company
15		GEN-59	
16	A-564	FORD-	Photo of U.S.S. Brannon (DE 444-6)
17		SUPP-3	(Attached as Ex. 1-1 to Ford's First Set of Requests for
18			Admission to Plaintiffs (Ford RFAs), served July 13, 2017)
19	A-565	FORD-	Patrick Jack Navy Asbestos Medical Surveillance Program
20		SUPP-4	record, dated December 8, 1988 (Attached as Ex. 3-1 to Ford
21			RFAs)
22	A-566	FORD-	Decedent Patrick Jack's Social Security Employment
23		SUPP-5	Records
24	A-567	FORD-	Selected Medical Records of Decedent Patrick Jack
25		SUPP-6	
26	A-568	FORD-	Selected Navy Records of Decedent Patrick Jack
		SUPP-7	
	A-569	FORD-	Selected PSNS Records of Decedent Patrick Jack
		SUPP-8	

A-571	FORD-SUPP-10	Insulation Photos (Ex. 21 to Decedent Patrick Jack's 6.20.2017 Deposition)
A-572	FORD-SUPP-11	PSNS Map (Ex. 2 to Decedent Patrick Jack's 6.22.2017 Deposition)
A-573	FORD-SUPP-12	PSNS Aerial Photo (Ex. 9 to Decedent Patrick Jack's 6.27.2017 Deposition)
A-574	FORD-SUPP-13	PSNS Aerial Photo (Ex. 10 to Decedent Patrick Jack's 6.27.2017 Deposition)
A-575	FORD-SUPP-14	PSNS Aerial Photo (Ex. 11 to Decedent Patrick Jack's 6.27.2017 Deposition)
A-576	FORD-SUPP-15	PSNS Aerial Photo (Ex. 18 to Decedent Patrick Jack's 6.28.2017 Deposition)
A-577	FORD-SUPP-16	PSNS Aerial Photo (Ex. 19 to Decedent Patrick Jack's 6.28.2017 Deposition)
A-578	FORD-SUPP-17	Pipe Insulation Half Round Photo (Ex. 40 to Decedent Patrick Jack's 6.30.2017 Deposition)
A-582 to A-600		Reserved.

Union Pacific Railroad

A-608	2007	Any and all radiology materials pertaining to Decedent including but not limited to those dates 11/23/2012, 11/30/2012, and 1/2/2014
A-609	2008	Any and all pathology materials pertaining to Decedent including but not limited to accession numbers P-17-017, ML-18-65, and R-18-8
A-610	2009	Gail Stockman's Curriculum Vitae
A-611	2010	Dr. Gail Stockman's Notes/ Report
A-612	2011	Dr. Gail Stockman's Reliance Material
A-613	2012	Dr. Gail Stockman's Power Point/Demonstrative
A-614	2013	Larry Liukonen's Curriculum Vitae
A-615	2014	Larry Liukonen's Notes/ Report
A-616	2015	Larry Liukonen's Reliance Material
A-617	2016	Larry Liukonen's Power Point/Demonstrative
A-618	2017	Carl Bradley, M.D.'s Curriculum Vitae
A-619	2018	Carl Bradley, M.D.'s Notes/ Report
A-320	2019	Carl Bradley, M.D.'s Reliance Material

1	A-621	2020	Carl Bradley, M.D.'s Power Point/Demonstrative
	A-622	2021	Dr. Michael Holland's Curriculum Vitae
2	A-623	2022	Dr. Michael Holland's Notes/Report
	A-624	2023	Dr. Michael Holland's Reliance Material
3	A-625	2024	Dr. Michael Holland's Power Point/Demonstrative
	A-626	2025	James Delaney's Curriculum Vitae
4	A-627	2026	James Delaney's Notes/ Report
	A-628	2027	James Delaney's Reliance Material
5	A-629	2028	James Delaney's Power Point/Demonstrative
	A-630	2029	Clancy Cornwall's Curriculum Vitae
6	A-631	2030	Clancy Cornwall's Notes/ Report
	A-632	2031	Clancy Cornwall's Reliance Material
7	A-633	2032	Clancy Cornwall's Power Point/Demonstrative
	A-634	2033	Dr. Victor Roggli's Curriculum Vitae
8	A-635	2034	Dr. Victor Roggli's Notes/ Report
	A-636	2035	Dr. Victor Roggli's Reliance Material
9	A-637	2036	Dr. Victor Roggli's Power Point/Demonstrative
	A-638	2037	Laura Dolan's Curriculum Vitae
10	A-639	2038	Laura Dolan's Notes/Report
	A-640	2039	Laura Dolan's Reliance Material
11	A-641	2040	Laura Dolan's Power Point/Demonstrative
	A-642	2041	Dr. C. Alan Brown's Curriculum Vitae
12	A-643	2042	Dr. C. Alan Brown's Notes/ Report
	A-644	2043	Dr. C. Alan Brown's Reliance Material
13	A-645	2044	Dr. C. Alan Brown's Power Point/ Demonstrative
	A-647	2046	All Defendants' Responses to Standard Asbestos Interrogatories Discovery
15	A-648	2047	All Defendants' Written Discovery Propounded to Plaintiff
	A-651	2050	Exhibit 2 to Decedent Patrick Jack's Discovery Deposition Transcript- Puget Sound Diagram
16	A-652	2051	Exhibit 3 to Decedent Patrick Jack's Discovery Deposition Transcript- Respirator Guide
	A-653	2052	Exhibit 4 to Decedent Patrick Jack's Discovery Deposition Transcript- Bluejackets Manual
18	A-654	2053	
	A-655	2054	Exhibit 6 to Decedent Patrick Jack's Discovery Deposition Transcript- Plaintiffs Rule 26 Initial Disclosure
19	A-656	2055	Exhibit 7 to Decedent Patrick Jack's Discovery Deposition Transcript-Affidavit of William Lowell
20	A-657	2056	Exhibit 8 to Decedent Patrick Jack's Discovery Deposition Transcript- Photograph
	A-658	2057	Exhibit 9 to Decedent Patrick Jack's Discovery Deposition Transcript-Puget Sound Shipyard Aerial Photograph
22	A-659	2058	Exhibit 10 to Decedent Patrick Jack's Discovery Deposition Transcript-Puget Sound Shipyard Aerial Photograph
23	A-660	2059	Exhibit 11 to Decedent Patrick Jack's Discovery Deposition Transcript-Combined Exhibits 9-10
24	A-661	2060	Exhibit 12 to Decedent Patrick Jack's Discovery Deposition Transcript-Aero Metallic Seattle Certification
25	A-662	2061	Exhibit 13 to Decedent Patrick Jack's Discovery Deposition Transcript-Salute
26			

A-663	2062	Exhibit 14 to Decedent Patrick Jack's Discovery Deposition Transcript-Salute Newspaper Article from October 6, 1972
A-664	2063	Exhibit 15 to Decedent Patrick Jack's Discovery Deposition Transcript-"Need a Respirator?"
A-665	2064	Exhibit 16 to Decedent Patrick Jack's Deposition Transcript-General Safety Rules Manual
A-666	2065	Exhibit 17 to Decedent Patrick Jack's Discovery Deposition Transcript-Owens Corning Fiberglass Product Notebook
A-667	2066	Exhibit 18 to Decedent Patrick Jack's Discovery Deposition Transcript-Aerial Photograph
A-668	2067	Exhibit 19 to Decedent Patrick Jack's Discovery Deposition Transcript-Aerial Photograph
A-669	2068	Exhibit 20 to Decedent Patrick Jack's Discovery Deposition Transcript-Aero Metric Certification
A-670	2069	Exhibits 21-29 to Decedent Patrick Jack's Discovery Deposition Transcript-Photographs
A-673		Aerial Photographs of Argo Yard
A-674 to A-800		

Viad Corp

A-801	1.	1962 Moody's Industrial Manual	Moody's Investors Service, Inc. 99 Church Street, New York 7 New York, USA
A-802	2.	Article re the History of Griscom-Russell	Margy Vogt 2002 Pub Bates Printing.
A-803	3.	1976 Article Griscom-Russell Closure	Ruth Kayne, Massillon Bicentennial
A-804	4.	Certificate of Dissolution of Griscom-Russell, 12/18/1963	Secretary of State, Delaware
A-805	5.	Armour & Co Special Director's Meeting	Armour & Company - EW Wilson
A-806	6.	Proxy Statement – 05/05/1965 - Armour and Company, William Prince	William Wood Prince, Armour & Company, Chicago, IL 60890
A-807	7.	June 29, 1965 revenue ruling Armour BLH merger (Viad 739 – 744)	Armour & Company
A-808	8.	1965 Statement of Information about merger (Viad 708 – 709)	Armour & Company
A-809	9.	Affidavit of Deborah DePaoli – Index to Armour 1965 Tax Return	Deborah DePaoli

A-810	10.	1965 Agreement Assigning Insurance to BLH DE 06/23/1965	Insurance Company of North America – BLH (PA) to BLH (DE)
A-811	11.	Certificate of Authority – State of PA (Ex 30)	Commonwealth of Pennsylvania – Dept. of State Corporation Bureau
A-812	12.	Agreement of Dissolution of BLH between BLH and Armour – 11/30/1975 (Ex 31)	Armour & Co. – D.L. Duensing, President.
A-813	13.	Dissolution by Unanimous Consent of BLH filed 06/21/1976 (Ex 32)	State of Delaware, Secretary of State.
A-814	14.	<u>November 1922, Bureau of Medicine & Surgery, U.S. Navy, United States Medical Bulletin, Vol. 17, No. 5 (5005, Ex A)</u>	Lt. Commander W.M. Kerr Bureau of Medicine & Surgery U.S. Navy Washington, DC
A-815	15.	<u>March 11, 1941 memo from C.S. Stephenson, Division of Preventive Medicine, U.S. Navy, to Admiral McIntire re: lack of protection of Navy yard workers from health hazards including asbestosis (5032, Ex Q)</u>	C.S. Stephenson Division of Preventive Medicine U.S. Navy
A-816	16.	<u>January 20, 1943, U.S. Navy Department, & February 9, 1943, U.S. Maritime Commission, approval of <i>Minimum Requirements for Safety and Industrial Health in Contract Shipyards</i> (5049, Ex B)</u>	U.S. Navy & U.S. Maritime Commission Washington, DC
A-817	17.	<u>January 31, 1945 letter from Philip Drinker, Chief Health Consultant, Division of Shipyard Labor Relations, to Captain Thomas J. Carter, Bureau of Medicine & Surgery, U.S. Navy (5080, Ex C)</u>	Philip Drinker, Chief Health Consultant Division of Shipyard Labor Relations Washington, DC
A-818	18.	<u>January 1946, Fleischer, Viles, Gade & Drinker, <i>The Journal of Industrial Hygiene and Toxicology</i>, Vol. 28, No. 1, “A</u>	Walter E. Fleischer, Frederick J. Viles Jr., Robert L. Gade and Philip Drinker, c/o Journal of Industrial Hygiene and Toxicology, William & Wilkins Co., Mount Royal & Guilford Aves., Baltimore,

		Health Survey of Pipe Covering Operations in Constructing Naval Vessels” (5091, Ex D)	MD
A-819	19.	<u>January 1947, excerpt from Safety Review, Vol. 4, No. 1</u> (5099, Ex E)	Safety Review Office of Industrial Relations U.S. Navy, Washington, DC
A-820	20.	<u>November 7, 1955, B.W. Hogan, U.S. Navy, Bureau of Medicine and Surgery (BuMed) Instruction 6260.5 to All Ships and Stations</u> enclosing Table of Threshold Limit Values establishing threshold limit values for toxic materials with Enclosure 1. (5153, Ex F)	B.W. Hogan Bureau of Medicine and Surgery U.S. Navy Washington, DC
A-821	21.	<u>1950 Gen Safety Rules Manual – PSNS. (Ex G)</u>	Puget Sound Naval Shipyard
A-822	22.	<u>January 7, 1958 memo from Chief, Bureau of Ordnance, U.S. Navy,</u> enclosing NavOrd Instruction 5100.21, “ <u>Safety Handbook for Pipefitters</u> ” (5159, Ex H)	Bureau of Ordnance U.S. Navy Washington, DC
A-823	23.	<u>February 1, 1961 memo from B.W. Hogan</u> enclosing July 1960 through September 1960 Occupational Health Hazards, Release No. 26, derived from July 1960 through September 1960 Industrial Health Reports. (5193, Ex I)	B.W. Hogan, Chief Bureau of Medicine and Surgery U.S. Navy, Washington, DC
A-824	24.	<u>May 1, 1961 memo from A.S. Chrisman,</u> Department of the Navy, enclosing Occupational Health Hazards, Release No. 27, derived from October 1960 through December 1960 Industrial Health Reports. (5196, Ex J)	A.S. Chrisman, Acting Chief Bureau of Medicine and Surgery U.S. Navy Washington, DC

1	A-825	25.	<u>October 1962, Safety Review, Vol. 19, No. 10, "Asbestosis", Capt. H.M. Robbins, MC USN. (5210, Ex K)</u>	Capt. H.M. Robbins MC USN, J.H. Clement, L.D. Vigneault, and C.V. Krieger c/o Safety Review Office of Industrial Relations U.S. Navy, Washington, DC
2	A-826	26.	<u>December 4, 1968 memo by T. Kenney to 7th Fleet enclosing:</u> a. 12/4/68 <i>Washington Post</i> article re: results of Dr. Irving Selikoff's autopsies b. 12/5/68 memo by Lt. Cdr. S.H. Barboo, BuMed, re: naval shipyards not alerted to asbestos hazards (5248, Ex L)	T. Kenney Bureau of Ships U.S. Navy Washington, DC
3	A-827	27.	<u>December 6, 1968 memo by Capt. N.E. Rosenwinkel, Assistant Chief for Research & Military Medical Specialties to shipyard employees re: asbestos hazard. (5250, Ex M)</u>	Capt. N.E. Rosenwinkel Assistant Chief for Research & Military Medical Specialties U.S. Navy, Washington, DC
4	A-828	28.	<u>February 9, 1971, Commander Naval Ship Systems Command, Naval Ships (NAVSHIPS) Instruction 5100.26, re: control of asbestos exposure hazards. (5270, Ex N)</u>	J.W. DeLak Jr., Deputy Commander for Field Activities Naval Ship Systems Command U.S. Navy, Washington, DC
5	A-829	29.	<u>July 17, 1973 letter from P.O. Geib, Department of the Navy, enclosing the Report of Occupational Health Services, Release No. 70, derived from July through December 1972 Occupational Health Reports (MED-6260-1). (5276, Ex O)</u>	P.O. Geib, Assistant Chief for Research and Military Medical Specialties Bureau of Medicine & Surgery U.S. Navy Washington, DC

A-830	30.	<u>January 23, 1974 letter from P.O. Geib, Bureau of Medicine & Surgery, Department of the Navy, enclosing the Report of Occupational Health Services, Release No. 71, derived from January 1, 1973 through June 30, 1973 Occupational Health Reports (MED-6260-1). (5277, Ex P)</u>	P.O. Geib, Assistant Chief for Research and Military Medical Specialties Bureau of Medicine & Surgery U.S. Navy, Washington, DC
A-831	31.	<u>05/1961 Master Mechanic Shop 56, PSNS Marine Pipe Covering and Insulating. (Ex 88)</u>	Puget Sound Naval Shipyard
A-832	32.	<u>Critical Materials Manual. (Ex 64)</u>	US Army and Navy Munitions Board, 01/30/1940
A-833	33.	<u>Lowell Produced – Insulation and Lagging for Distilling Plant and Turbo-Generator.</u>	Federal Shipbuilding and Dry Dock Co., Bureau of Ships Plan No. DE 99-S3902-83 ALT
A-834	34.	<u>Substitution for Asbestos on Ships, Sargent.</u>	National Defense, Chapter IX – Office of Production Management, Subchapter B – Priorities Division
A-835	35.	<u>03/1940 Strategic and Critical Materials – Sargent. (Ex 293)</u>	US Army and Navy Munitions Board
A-836	36.	<u>900829 Belding MD Record Discovery Dep. Exhibit 30</u>	Dr. Belding
A-837	37.	<u>840809 Occupational Hx (Jack Perp Dep Exh 49)</u>	Plaintiff and PSNS
A-838 to A-1000	38.		

XVII. ACTION BY THE COURT

This case is scheduled for trial before a jury on October 1, 2018, at 9:00 a.m.

The pre-trial conference is scheduled for September 17, 2018 at 2:00 p.m.

Trial briefs, proposed voir dire questions, proposed jury instructions, and proposed verdict forms shall be submitted to the court on or before September 25, 2018.

1 A copy of all exhibits shall be submitted to the court on or before September 27,
2 2018.

3 This order has been approved by the parties as evidenced by the signature of their
4 counsel. This order shall control the subsequent course of the action unless modified by a
5 subsequent order. This order shall not be amended except by order of the court pursuant to
6 agreement of the parties or to prevent manifest injustice.
7

8
9 DATED this ____ day of ____ 2018,

10
11 _____
12 Honorable James L. Robart, United States District Judge

13
14 FORM APPROVED

15 _____
16 Attorney for Plaintiffs

17 _____
18 Attorney for BorgWarner Morse TEC, LLC

19 _____
20 Attorney for Viad Corp.

21 _____
22 Attorney for Ford Motor Company

23 _____
24 Attorney for DCo, LLC

25 _____
26 Attorney for Union Pacific Railroad Company

1 RESPECTFULLY SUBMITTED this 26th day of September, 2018.

2
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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2018, I electronically filed the foregoing with the clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED: September 26, 2018, at Seattle, Washington

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